

EXHIBIT A
TIME DETAIL

50 E. Washington St.
Suite 400
Chicago, IL 60602
(312) 283-1590



1000 Maine Ave. SW
Suite 450
Washington, D.C. 20024
(202) 652-4511

PRIVILEGED & CONFIDENTIAL

June 29, 2023

Official Committee of Talc Claimants

In re LTL Management, No 23-12825
United States Bankruptcy Court for the District of New Jersey

Invoice Period: 04-14-2023 - 05-31-2023

RE: LTL Management Bankruptcy Official TCC II

Time Details

Date	Professional	Task	Hours	Rate	Amount
04-14-2023	JSM	B160 - Fee/Employment Application Zoom with committee to discuss retention as counsel for committee.	0.40	1,160.00	464.00
04-15-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings Zoom with committee to discuss legal strategy for PI hearing on April 18.	0.80	1,160.00	928.00
04-15-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings Reviewing summary of Haas deposition.	0.40	1,160.00	464.00
04-15-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings Reviewing summary of Kim deposition.	0.40	1,160.00	464.00
04-15-2023	MC	B140 - Relief from Stay / Adequate Protection Proceedings Review new draft of objection to motion to apply automatic stay to non-debtors and for preliminary injunction for purposes of providing comments to Jonathan Massey and Rachel Morse.	1.30	1,000.00	1,300.00
04-15-2023	MC	B140 - Relief from Stay / Adequate Protection Proceedings Analyze documents in debtor's production for purposes of opposing automatic stay.	1.70	1,000.00	1,700.00
04-15-2023	MC	B140 - Relief from Stay / Adequate Protection Proceedings Draft notes on documents in debtor's production for Jonathan Massey for use in opposing automatic stay.	0.60	1,000.00	600.00
04-15-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings Attended portion of Pulaski deposition for purposes of developing factual record for preliminary injunction relief.	1.80	860.00	1,548.00
04-15-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings Correspondence with colleagues and co-counsel re opposition to preliminary injunction motion.	0.40	860.00	344.00
04-15-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings Zoom conference with co-counsel re work and strategies for court hearing on preliminary injunction motion.	0.90	860.00	774.00
04-15-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions) Correspondence with colleagues and co-counsel re theories for motion to dismiss.	0.40	860.00	344.00

Date	Professional	Task	Exhibit A	Page 3 of 43	Hours	Rate	Amount
04-15-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			2.90	1,160.00	3,364.00
		Revising opposition to preliminary injunction stay relief motion.					
04-15-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.20	1,160.00	2,552.00
		Revising draft motion to dismiss.					
04-16-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.80	1,160.00	2,088.00
		Additional revisions to draft motion to dismiss.					
04-16-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			2.10	1,160.00	2,436.00
		Reviewing final version of transcript of Kim deposition for preliminary injunction stay relief hearing on April 18.					
04-16-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.70	1,160.00	1,972.00
		Reviewing final version of transcript of Haas deposition for preliminary injunction stay relief hearing on April 18.					
04-16-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.10	1,160.00	1,276.00
		Reviewing transcript of Pulaski deposition for preliminary injunction stay relief hearing on April 18.					
04-16-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.30	1,160.00	1,508.00
		Reviewing transcript of Murdica deposition for preliminary injunction stay relief hearing on April 18.					
04-16-2023	JGM	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.40	800.00	1,920.00
		Analyze documents for use in preliminary injunction opposition.					
04-16-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			3.20	1,160.00	3,712.00
		Revising opposition to preliminary injunction stay relief motion.					
04-16-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.50	1,160.00	1,740.00
		Zoom with committee to discuss legal strategy for PI hearing on April 18.					
04-16-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.70	860.00	602.00
		Correspondence with co-counsel re arguments in support of motion to dismiss.					
04-16-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.80	860.00	1,548.00
		Attended portion of Murdica deposition for purposes of developing factual arguments in opposition to preliminary injunction motion.					
04-16-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.30	860.00	1,118.00
		Zoom conference with clients re strategy and decision-making re preliminary injunction hearing.					
04-16-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.10	860.00	946.00
		Confer with co-counsel re preparing for preliminary injunction hearing.					
04-17-2023	RA	B110 - Case Administration			2.10	320.00	672.00
		Prepare materials received from co-counsel (including production and deposition materials) for J. Massey's use in opposing preliminary injunction.					
04-17-2023	RA	B110 - Case Administration			0.40	320.00	128.00
		Revise production materials per Debtor's clawback letter request.					
04-17-2023	RSM	B110 - Case Administration			0.30	860.00	258.00
		Attended portion of Zoom conference with committee members, committee representatives, and co-counsel re case developments and next steps.					
04-17-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.70	860.00	1,462.00
		Attended portion of Watts deposition for purposes of developing factual record re preliminary injunction motion.					
04-17-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	860.00	344.00

Date	Professional	Task	Exhibit A	Page 4 of 43	Hours	Rate	Amount
			Correspondence with co-counsel re proposed procedures for presentation of evidence at preliminary injunction hearing.				
04-17-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.90	860.00	774.00	
			Attended portion of Dickinson deposition for purposes of developing factual record re preliminary injunction motion.				
04-17-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.40	860.00	344.00	
			Correspondence with colleagues re deposition designations for preliminary injunction hearing.				
04-17-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	860.00	258.00	
			Correspondence with co-counsel re issues with Debtor's document production.				
04-17-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.90	860.00	774.00	
			Attended portion of Birchfield deposition for purposes of developing factual record re preliminary injunction motion.				
04-17-2023	RSM	B110 - Case Administration		0.10	860.00	86.00	
			Reviewed draft letter re confidentiality requirements of prior TCC member representatives.				
04-17-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	860.00	258.00	
			Analyzed US Trustee's objection to preliminary injunction.				
04-17-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	860.00	258.00	
			Attended portion of Moulton deposition for purposes of developing factual record re preliminary injunction motion.				
04-17-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		2.20	860.00	1,892.00	
			Drafted deposition designations for Dickinson for inclusion in preliminary injunction record.				
04-17-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		3.10	860.00	2,666.00	
			Drafted deposition designations for Haas for inclusion in preliminary injunction record.				
04-17-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		1.30	1,160.00	1,508.00	
			Reviewing final version of objection to Debtor's preliminary injunction motion.				
04-17-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		1.20	1,160.00	1,392.00	
			Reviewing transcript of Dickinson deposition for preliminary injunction stay relief hearing on April 18.				
04-17-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.40	1,160.00	464.00	
			Email communication with Mike Winograd regarding PI closing argument.				
04-17-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	1,160.00	348.00	
			Email communication with Eric Goodman regarding PI closing argument.				
04-17-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	1,160.00	580.00	
			Email communication with TCC counsel regarding PI closing argument.				
04-17-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.40	1,160.00	464.00	
			Email communication with TCC counsel regarding designations of record for PI hearing.				
04-17-2023	JSM	B195 - Non-Working Travel		2.50	580.00	1,450.00	
			Travel to NJ bankruptcy PI hearing.				
04-17-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		1.80	1,160.00	2,088.00	
			Drafting designations of record for PI hearing.				
04-17-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		2.30	1,160.00	2,668.00	
			Drafting notes for use in PI closing argument.				

Date	Professional	Task	Exhibit A	Page 5 of 43	Hours	Rate	Amount
04-17-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			3.20	1,160.00	3,712.00
		Revising motion to dismiss Debtor's bankruptcy petition.					
04-18-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			6.10	860.00	5,246.00
		Attended remotely portion of court hearing re preliminary injunction relief.					
04-18-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	860.00	258.00
		Correspondence with co-counsel and colleague re deposition designations for record on preliminary injunction motion hearing.					
04-18-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			2.10	860.00	1,806.00
		Worked on analyzing which portions of deponent testimony to designate for preliminary injunction hearing record.					
04-18-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.10	1,160.00	1,276.00
		Drafting notes for use in PI closing argument.					
04-18-2023	JSM	B195 - Non-Working Travel			2.90	580.00	1,682.00
		Travel from NJ bankruptcy PI hearing.					
04-18-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			8.90	1,160.00	10,324.00
		Attend NJ bankruptcy PI hearing.					
04-18-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.50	1,160.00	580.00
		Email communication with TCC counsel regarding designations of record for PI hearing.					
04-18-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			2.10	1,160.00	2,436.00
		Drafting designations of record for PI hearing.					
04-18-2023	RA	B160 - Fee/Employment Application			2.40	320.00	768.00
		Continue to draft retention application and supporting papers.					
04-18-2023	RA	B110 - Case Administration			1.40	320.00	448.00
		Review deposition testimony of Debtor witnesses for preliminary injunction.					
04-19-2023	JSM	B110 - Case Administration			1.10	1,160.00	1,276.00
		Zoom with TCC representatives re legal strategy and next steps.					
04-19-2023	JSM	B110 - Case Administration			0.50	1,160.00	580.00
		Zoom with TCC counsel re legal strategy and next steps.					
04-19-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.80	1,160.00	2,088.00
		Drafting designations of record for PI hearing.					
04-19-2023	RA	B110 - Case Administration			2.60	320.00	832.00
		Draft deposition designations to be submitted to Court.					
04-19-2023	RA	B160 - Fee/Employment Application			1.10	320.00	352.00
		Continue to draft retention application and supporting papers.					
04-19-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	860.00	344.00
		Correspondence with co-counsel re deposition designations for preliminary injunction record.					
04-19-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	860.00	258.00
		Correspondence with clients and co-counsel re post-hearing submissions.					
04-19-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.50	860.00	430.00
		Zoom conference with co-counsel re motion to dismiss approaches.					
04-19-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.20	860.00	1,032.00
		Zoom conference with committee members, representatives, and co-counsel re next steps and strategies for case after PI hearing.					

Date	Professional	Task	Exhibit A	Page 6 of 43	Hours	Rate	Amount
04-19-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.70	860.00	602.00
		Worked on drafting testimony designations for submission with PI evidentiary record.					
04-19-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.20	860.00	1,892.00
		Analyzed factual issues re counsel representations re number of claimants for inclusion in motion to dismiss.					
04-19-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.30	860.00	1,118.00
		Drafted insert for motion to dismiss re reliability of representations regarding number of claimants.					
04-19-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			9.80	1,160.00	11,368.00
		Revising motion to dismiss Debtor's bankruptcy petition.					
04-20-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	860.00	344.00
		Correspondence with clients and co-counsel re objection to Debtor's supplemental submission in support of preliminary injunction.					
04-20-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.60	860.00	516.00
		Attended remotely Court hearing re ruling on preliminary injunction.					
04-20-2023	RSM	B110 - Case Administration			0.10	860.00	86.00
		Reviewed initial statement of ad hoc group of supporting law firms.					
04-20-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	860.00	258.00
		Correspondence with clients and co-counsel re next steps after Court's bench ruling on preliminary injunction.					
04-20-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	860.00	258.00
		Correspondence with clients and co-counsel re Third Circuit action plan.					
04-20-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	860.00	258.00
		Reviewed summary of Court ruling re preliminary injunction issues.					
04-20-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.20	860.00	172.00
		Reviewed Crouch supplemental objection to preliminary injunction.					
04-20-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	860.00	344.00
		Reviewed Debtor's rebuttal arguments re preliminary injunction.					
04-20-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.60	860.00	1,376.00
		Analyzed proposed revisions to draft motion to dismiss.					
04-20-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	1,160.00	464.00
		Attend court zoom announcing ruling on PI motion.					
04-20-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			4.30	1,160.00	4,988.00
		Drafting motion to certify direct appeal of bankruptcy court ruling on PI motion.					
04-20-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.50	1,160.00	580.00
		Call with TCC appellate counsel to discuss next steps regarding bankruptcy court ruling on PI motion.					
04-20-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.60	1,160.00	696.00
		Email communication with TCC appellate counsel to discuss next steps regarding bankruptcy court ruling on PI motion.					
04-20-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.50	1,160.00	580.00
		Email communication with TCC committee counsel to discuss next steps regarding bankruptcy court ruling on PI motion.					
04-20-2023	JSM	B190 - Other Contested Matters (excluding			5.20	1,160.00	6,032.00

Date	Professional	Task	Exhibit A	Page 7 of 43	Hours	Rate	Amount
			assumption / rejection motions)				
04-21-2023	JSM	Revising motion to dismiss Debtor's bankruptcy petition.	B140 - Relief from Stay / Adequate Protection Proceedings		0.60	1,160.00	696.00
04-21-2023	JSM	Email communication with TCC appellate counsel to discuss next steps regarding bankruptcy court ruling on PI motion.	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	1,160.00	580.00
04-21-2023	JSM	Email communication with TCC committee counsel to discuss next steps regarding bankruptcy court ruling on PI motion.	B110 - Case Administration		1.10	1,160.00	1,276.00
04-21-2023	JSM	Zoom with TCC representatives re legal strategy and next steps.	B140 - Relief from Stay / Adequate Protection Proceedings		0.40	1,160.00	464.00
04-21-2023	JSM	Email communication with Don Clarke re preparation of motion for direct certification of appeal.	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	1,160.00	348.00
04-21-2023	JSM	Telephone communication with Don Clarke re preparation of motion for direct certification of appeal.	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	1,160.00	464.00
04-21-2023	JSM	Email communication with David Castleman re revisions to motion to dismiss.	B140 - Relief from Stay / Adequate Protection Proceedings		0.60	1,160.00	696.00
04-21-2023	JSM	Drafting notice of appeal of bankruptcy court ruling on PI motion.	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	1,160.00	580.00
04-21-2023	JSM	Email communication with committee counsel regarding form of order for bankruptcy court ruling on PI.	B140 - Relief from Stay / Adequate Protection Proceedings		3.90	1,160.00	4,524.00
04-21-2023	JSM	Revising motion to certify direct appeal of bankruptcy court ruling on PI motion.	B140 - Relief from Stay / Adequate Protection Proceedings		3.80	1,160.00	4,408.00
04-21-2023	RSM	Drafting petition for writ of mandamus to Third Circuit in connection with bankruptcy court ruling on PI motion.	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	860.00	258.00
04-21-2023	RSM	Correspondence with co-counsel re arguments for motion to dismiss.	B110 - Case Administration		1.40	860.00	1,204.00
04-21-2023	RSM	Zoom conference with committee members, representatives, and co-counsel re next steps and strategies after preliminary injunction ruling.	B190 - Other Contested Matters (excluding assumption / rejection motions)				
04-21-2023	RSM	Correspondence with clients and co-counsel re preliminary injunction order.	B140 - Relief from Stay / Adequate Protection Proceedings		0.20	860.00	172.00
04-21-2023	RSM	Correspondence with co-counsel re preliminary injunction order.	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.00	860.00	860.00
04-21-2023	RA	Zoom conference with co-counsel re case strategy re motion to dismiss and next steps.	B160 - Fee/Employment Application		0.40	320.00	128.00
04-22-2023	RSM	Work on supplement to retention application to account for new top creditors list.	B110 - Case Administration		0.30	860.00	258.00
04-22-2023	RSM	Correspondence with committee representatives re approach to mediation and mediator selection.	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	860.00	430.00
04-22-2023	JSM	Correspondence with co-counsel and committee representatives re motion to dismiss arguments.	B140 - Relief from Stay / Adequate Protection Proceedings		5.90	1,160.00	6,844.00
04-22-2023	JSM	Drafting petition for writ of mandamus to Third Circuit in connection with bankruptcy court ruling on PI motion.	B140 - Relief from Stay / Adequate Protection Proceedings		0.40	1,160.00	464.00

Date	Professional	Task	Exhibit A	Page 8 of 43	Hours	Rate	Amount
		Proceedings					
04-22-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Email communication with committee counsel regarding form of order for bankruptcy court ruling on PI.		2.20	1,160.00	2,552.00
04-23-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Revising motion to dismiss Debtor's bankruptcy petition.		1.20	1,160.00	1,392.00
04-23-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Reviewing edits to motion to dismiss Debtor's bankruptcy petition.		0.30	1,160.00	348.00
04-23-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Email communication with committee counsel regarding form of order for bankruptcy court ruling on PI.		4.40	1,160.00	5,104.00
04-23-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Drafting petition for writ of mandamus to Third Circuit in connection with bankruptcy court ruling on PI motion.		3.10	1,160.00	3,596.00
04-23-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Revising petition for writ of mandamus to Third Circuit in connection with bankruptcy court ruling on PI motion.		0.30	1,160.00	348.00
04-23-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Revising TCC proposed form of order for bankruptcy court ruling on PI.		0.20	1,160.00	232.00
04-23-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Reviewing draft letter regarding debtor's confidentiality designations in connection with bankruptcy court PI hearing.				
04-23-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Correspondence with committee representatives and co-counsel re motion to dismiss.		0.30	860.00	258.00
04-23-2023	RSM	B110 - Case Administration	Correspondence with committee representatives and co-counsel re confidentiality order issues.		0.20	860.00	172.00
04-23-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	Correspondence with committee representatives and co-counsel re order on TRO and preliminary injunction.		0.30	860.00	258.00
04-23-2023	RSM	B110 - Case Administration	Correspondence with committee representatives and co-counsel re order on TRO and preliminary injunction.		0.10	860.00	86.00
04-23-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Reviewed draft committee bylaws.				
04-23-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Reviewed proposed additional arguments for motion to dismiss.		0.30	860.00	258.00
04-24-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Zoom with TCC committee counsel regarding next steps on motion to dismiss.		0.80	1,160.00	928.00
04-24-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Zoom with TCC committee counsel regarding next steps on motion to dismiss.		0.20	1,160.00	232.00
04-24-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Email communication with Mike Winograd regarding potential discovery for motion to dismiss.		0.60	1,160.00	696.00
04-24-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Reviewing draft potential discovery for motion to dismiss.		0.40	860.00	344.00
04-24-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	Correspondence with co-counsel re motion to dismiss opening brief.		0.30	860.00	258.00
04-24-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Correspondence with colleagues re mandamus writ petition.		0.70	860.00	602.00
			Zoom conference with committee member representatives and co-counsel re preliminary injunction order effect and discovery strategy for motion to dismiss.				

Date	Professional	Task	Exhibit A	Page 9 of 43	Hours	Rate	Amount
04-24-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.50	860.00	430.00
		Zoom conference with co-counsel re appellate next steps re preliminary injunction.					
04-24-2023	RSM	B110 - Case Administration			0.30	860.00	258.00
		Correspondence with committee representatives and co-counsel re FCR objection.					
04-24-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	1,160.00	464.00
		Email communication with committee counsel regarding form of order for bankruptcy court ruling on PI.					
04-24-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	1,160.00	464.00
		Reviewing debtor's proposed form of order for bankruptcy court ruling on PI.					
04-24-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.60	1,160.00	696.00
		Reviewing edits to motion to dismiss Debtor's bankruptcy petition.					
04-24-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.50	1,160.00	580.00
		Email communication with TCC counsel regarding MTD filing.					
04-24-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.50	1,160.00	580.00
		Telephone conference with counsel for federal government regarding bankruptcy court's injunction order.					
04-24-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.00	1,160.00	1,160.00
		Zoom discussion of PI order with TCC counsel and representatives.					
04-24-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			2.20	1,160.00	2,552.00
		Drafting insert for petition for writ of mandamus.					
04-24-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.70	1,160.00	812.00
		Reviewing draft TCC proposed order for preliminary injunction.					
04-24-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	1,160.00	464.00
		Email communication with TCC counsel re draft TCC proposed order for preliminary injunction.					
04-24-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	1,160.00	348.00
		Reviewing debtor's proposed order for preliminary injunction.					
04-24-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	1,160.00	348.00
		Email communication with Mike Winograd regarding confidentiality designations from PI hearing.					
04-24-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	1,160.00	464.00
		Email communication with TCC counsel regarding petition for writ of mandamus.					
04-24-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	1,160.00	348.00
		Email communication with TCC representatives regarding petition for writ of mandamus.					
04-24-2023	JSM	B110 - Case Administration			0.60	1,160.00	696.00
		Reviewing TCC response to mediation motion.					
04-24-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	1,160.00	348.00
		Reviewing debtor's response to motion to shorten time on motion to certify PI order for direct appeal.					
04-24-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	1,160.00	348.00
		Reviewing TCC letter on term sheet confidentiality in connection with PI order.					
04-24-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
		Email communication with TCC counsel regarding MTD schedule.					
04-24-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00

Date	Professional	Task	Exhibit A	Page 10 of 43	Hours	Rate	Amount
			Reviewing TCC objection to appointment of Randi Ellis as FCR.				
04-25-2023	JSM	B110 - Case Administration		0.40	1,160.00		464.00
			Reviewing TCC objection to appointment of Randi Ellis as FCR.				
04-25-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00		348.00
			Email communication with TCC counsel regarding Chris Placitella and possible MTD exhibit.				
04-25-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	1,160.00		464.00
			Reviewing proposals for discovery in connection with motion to dismiss hearing.				
04-25-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		4.30	1,160.00		4,988.00
			Revising petition for writ of mandamus.				
04-25-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00		348.00
			Email communication with TCC counsel re MTD schedule.				
04-25-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	1,160.00		580.00
			Email communication with TCC representatives regarding petition for writ of mandamus.				
04-25-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.40	1,160.00		464.00
			Email communication with TCC counsel regarding petition for writ of mandamus.				
04-25-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		2.10	1,160.00		2,436.00
			Drafting insert for petition for writ of mandamus.				
04-25-2023	RSM	B110 - Case Administration		0.10	860.00		86.00
			Correspondence with J. Massey re upcoming case workstreams.				
04-25-2023	RSM	B110 - Case Administration		0.20	860.00		172.00
			Reviewed correspondence with Court re confidentiality challenge.				
04-25-2023	RSM	B110 - Case Administration		0.20	860.00		172.00
			Correspondence with committee representatives and co-counsel re FCR objection.				
04-25-2023	RSM	B110 - Case Administration		0.30	860.00		258.00
			Correspondence with committee representatives and co-counsel re mediator candidate issues.				
04-25-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	860.00		258.00
			Reviewed Stoltz memo re timeline for motion to dismiss.				
04-25-2023	RA	B110 - Case Administration		0.30	320.00		96.00
			Prepare materials re second bankruptcy filing for U. Ibrahim's review.				
04-26-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.60	485.00		291.00
			Conference with R. Morse re case developments and next steps re motion to dismiss.				
04-26-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.60	860.00		516.00
			Conference with U. Ibrahim re case developments and next steps re motion to dismiss.				
04-26-2023	RSM	B110 - Case Administration		0.70	860.00		602.00
			Zoom conference with co-counsel re ongoing projects and upcoming issues, including FCR objection, PI appeal, mediator selection, and motion to dismiss.				
04-26-2023	RSM	B110 - Case Administration		0.30	860.00		258.00
			Correspondence with committee representatives and co-counsel re FCR issues.				
04-26-2023	RSM	B110 - Case Administration		0.90	860.00		774.00
			Zoom conference with committee representatives and co-counsel re case developments and strategies, including FCR issues, mediation, PI appeal, and motion to dismiss.				
04-26-2023	RSM	B110 - Case Administration		0.20	860.00		172.00
			Correspondence with committee representatives and co-counsel re bylaws.				
04-26-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	860.00		430.00

Date	Professional	Task	Exhibit A	Page 11 of 43	Hours	Rate	Amount
			Correspondence with co-counsel re discovery for motion to dismiss hearing.				
04-26-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings		0.70	485.00		339.50
			Revised introduction of draft petition for writ of mandamus.				
04-26-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings		0.40	485.00		194.00
			Revised issues presented of draft petition for writ of mandamus.				
04-26-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings		1.40	485.00		679.00
			Revised statement of case of draft petition for writ of mandamus.				
04-26-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings		0.60	485.00		291.00
			Revised analytical portion of draft petition for writ of mandamus.				
04-26-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	1,160.00		580.00
			Email communication with TCC counsel regarding petition for writ of mandamus.				
04-26-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.60	1,160.00		696.00
			Email communication with TCC representatives regarding petition for writ of mandamus.				
04-26-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	1,160.00		464.00
			Reviewing proposals for discovery in connection with motion to dismiss hearing.				
04-26-2023	JSM	B110 - Case Administration		0.40	1,160.00		464.00
			Reviewing TCC objection to appointment of Randi Ellis as FCR.				
04-26-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		1.80	1,160.00		2,088.00
			Revising petition for writ of mandamus.				
04-26-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.60	1,160.00		696.00
			Drafting insert for petition for writ of mandamus.				
04-26-2023	JSM	B110 - Case Administration		0.30	1,160.00		348.00
			Reviewing TCC letter to court regarding appointment of mediator.				
04-26-2023	JSM	B110 - Case Administration		0.60	1,160.00		696.00
			Zoom with TCC counsel to discuss legal strategy and next steps.				
04-26-2023	JSM	B110 - Case Administration		1.70	1,160.00		1,972.00
			Zoom with TCC counsel and representatives to discuss legal strategy and next steps.				
04-26-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.40	1,160.00		464.00
			Email communication with MoloLamken team regarding petition for writ of mandamus.				
04-26-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.60	1,160.00		696.00
			Reviewing comments on petition for writ of mandamus from David Castleman of Otterbourg.				
04-26-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	1,160.00		580.00
			Reviewing comments on petition for writ of mandamus from Eric Goodman of Brown Rudnick.				
04-26-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.40	1,160.00		464.00
			Reviewing comments on petition for writ of mandamus from Moshe Maimon.				
04-26-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	1,160.00		348.00
			Reviewing comments on petition for writ of mandamus from Steve Kazan.				
04-27-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.40	1,160.00		464.00
			Reviewing comments on petition for writ of mandamus from Chris Tisi.				
04-27-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	1,160.00		348.00

Date	Professional	Task	Exhibit A	Page 12 of 43	Hours	Rate	Amount
			Reviewing comments on petition for writ of mandamus from Jerry Block.				
04-27-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.30	1,160.00		348.00
			Reviewing comments on petition for writ of mandamus from Michelle Parfitt.				
04-27-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.30	1,160.00		348.00
			Email communication with TCC representatives regarding petition for writ of mandamus.				
04-27-2023	JSM		B110 - Case Administration	0.30	1,160.00		348.00
			Reviewing US Trustee objection to debtor's FCR motion.				
04-27-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.50	1,160.00		580.00
			Zoom with TCC counsel to discuss debtor's confidentiality designations with respect to PI record.				
04-27-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	1.10	1,160.00		1,276.00
			Reviewing debtor's confidentiality designations with respect to Murdica deposition in PI record.				
04-27-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.80	1,160.00		928.00
			Reviewing debtor's confidentiality designations with respect to Pulaski deposition in PI record.				
04-27-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.50	1,160.00		580.00
			Email communication with MoloLamken team regarding petition for writ of mandamus.				
04-27-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	1.60	1,160.00		1,856.00
			Revising petition for writ of mandamus.				
04-27-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,160.00		348.00
			Reviewing further revised proposals for discovery in connection with motion to dismiss hearing.				
04-27-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.50	1,160.00		580.00
			Email communication with TCC representatives regarding petition for writ of mandamus.				
04-27-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.60	1,160.00		696.00
			Email communication with TCC counsel regarding petition for writ of mandamus.				
04-27-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.70	1,160.00		812.00
			Zoom with TCC appellate team to discuss bankruptcy court's PI order of 4-27-23.				
04-27-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.80	1,160.00		928.00
			Reviewing bankruptcy court's PI order of 4-27-23.				
04-27-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	1.60	1,160.00		1,856.00
			Drafting insert for mandamus petition to address bankruptcy court's PI order of 4-27-23.				
04-27-2023	RA		B110 - Case Administration	0.20	320.00		64.00
			Review PHV applications for J. Massey and R. Morse.				
04-27-2023	RA		B160 - Fee/Employment Application	0.40	320.00		128.00
			Review listing of affiliated persons/corporations for potential conflicts and inclusions in retention application.				
04-27-2023	RA		B110 - Case Administration	0.50	320.00		160.00
			Confer with R. Morse, J. Schein, and M. Reining re issues re confidentiality challenges workstream.				
04-27-2023	RA		B110 - Case Administration	1.40	320.00		448.00
			Review additional deposition materials received from Brown Rudnick.				
04-27-2023	UI		B140 - Relief from Stay / Adequate Protection Proceedings	1.10	485.00		533.50
			Analyze final draft of petition for writ of mandamus.				
04-27-2023	UI		B110 - Case Administration	0.30	485.00		145.50
			Meeting with J. Massey, R. Morse, M. Reining, S. Sieger-Grimm, and M. Winograd re legal strategy of case.				
04-27-2023	UI		B110 - Case Administration	0.20	485.00		97.00

Date	Professional	Task	Exhibit A	Page 13 of 43	Hours	Rate	Amount
			Communicating with R. Morse re work product and strategy meeting with J. Massey, S. Sieger-Grimm, M. Reining, and M. Winograd.				
04-27-2023	UI	B110 - Case Administration		2.10	485.00	1,018.50	
			Drafted analysis of documents utilized to advance arguments in the April 18, 2023 hearing regarding certification of appeal.				
04-27-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.90	485.00	921.50	
			Analyzed confidentiality designation of Richard Dickinson's April 17, 2023 deposition.				
04-27-2023	UI	B110 - Case Administration		0.10	485.00	48.50	
			Meeting with J. Massey and R. Morse to discuss applicable steps to achieving legal strategy for certification of appeal to third circuit.				
04-27-2023	RSM	B160 - Fee/Employment Application		2.70	860.00	2,322.00	
			Worked on retention application.				
04-27-2023	RSM	B160 - Fee/Employment Application		0.40	860.00	344.00	
			Communicate with colleagues re information needed for retention application.				
04-27-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	860.00	258.00	
			Zoom with M. Winograd, S. Seiger, M. Reining, J. Massey, and U. Ibrahim re confidentiality challenges.				
04-27-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.20	860.00	172.00	
			Phone conference with J. Massey and U. Ibrahim re next steps re confidentiality challenges.				
04-27-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	860.00	430.00	
			Confer with J. Schein, M. Reining, and R. Aguirre re issues re confidentiality challenges workstream.				
04-27-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		3.70	860.00	3,182.00	
			Analyzed preliminary injunction hearing record re confidentiality issues.				
04-27-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	860.00	258.00	
			Confer with U. Ibrahim re deposition designation challenge review work.				
04-27-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	860.00	344.00	
			Correspondence with committee representatives and co-counsel re J&J affiliate liabilities.				
04-27-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	860.00	430.00	
			Correspondence with committee representatives and co-counsel re Court's written opinion on preliminary injunction.				
04-28-2023	UI	B160 - Fee/Employment Application		1.70	485.00	824.50	
			Reviewing revised conflicts lists for purposes of inclusion in retention application.				
04-28-2023	UI	B110 - Case Administration		0.60	485.00	291.00	
			Zoom with co-counsel to discuss litigation strategy.				
04-28-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.30	485.00	630.50	
			Meeting with J. Massey and R. Moore re legal research to advance arguments at forthcoming motion to dismiss hearing.				
04-28-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	860.00	344.00	
			Correspondence with committee representatives and co-counsel re strategies for motion to dismiss approach.				
04-28-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	860.00	258.00	
			Correspondence with committee representatives and co-counsel re mandamus of preliminary injunction ruling.				
04-28-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	860.00	430.00	
			Correspondence with colleagues and co-counsel re confidentiality challenges.				
04-28-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.60	860.00	516.00	

Date	Professional	Task	Exhibit A	Page 14 of 43	Hours	Rate	Amount
Zoom conference with colleagues and co-counsel re strategies and action items for motion to dismiss hearing and discovery in preparation of it.							
04-28-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.30	860.00	1,118.00
Zoom conference with J. Massey and U. Ibrahim re legal arguments for motion to dismiss hearing.							
04-28-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.70	860.00	602.00
Analyzed potential confidentiality challenges to preliminary injunction record.							
04-28-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	485.00	194.00
Analyzed J. Massey's red line edits to motion to dismiss.							
04-28-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	485.00	48.50
Communicating with co-counsel regarding confidentiality designations relating to motion to dismiss.							
04-28-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	1,160.00	348.00
Email communication to TCC counsel regarding amendment of notice of appeal to include written stay order.							
04-28-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.70	1,160.00	812.00
Zoom with TCC counsel to discuss MTD litigation strategy.							
04-28-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	1,160.00	348.00
Email communication with TCC counsel regarding debtor's confidentiality designations.							
04-28-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.20	1,160.00	1,392.00
Zoom with Rachel Morse and Usama Ibrahim to discuss MTD legal strategy.							
04-28-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.60	1,160.00	696.00
Email communication with TCC counsel regarding petition for writ of mandamus.							
04-28-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.60	1,160.00	696.00
Email communication with TCC representatives regarding petition for writ of mandamus.							
04-28-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	1,160.00	464.00
Reviewing proposals for discovery in connection with motion to dismiss hearing.							
04-28-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.40	1,160.00	1,624.00
Revising petition for writ of mandamus.							
04-28-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.60	1,160.00	696.00
Email communication with MoloLamken team regarding petition for writ of mandamus.							
04-28-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	1,160.00	464.00
Reviewing confidentiality designations with respect to Molton deposition in PI record.							
04-28-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	1,160.00	464.00
Reviewing confidentiality designations with respect to Birchfield deposition in PI record.							
04-28-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.10	1,160.00	1,276.00
Reviewing debtor's confidentiality designations with respect to documents in PI record.							
04-28-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.70	1,160.00	1,972.00
Drafting response to debtor's confidentiality designations in PI record.							
04-29-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.50	1,160.00	580.00
Email communication with MoloLamken team regarding petition for writ of mandamus.							
04-29-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			1.60	1,160.00	1,856.00

Date	Professional	Task	Exhibit A	Page 15 of 43	Hours	Rate	Amount
			Proceedings				
04-29-2023	JSM		Revising petition for writ of mandamus.				
04-29-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.50	1,160.00		580.00
04-29-2023	JSM		Email communication with TCC representatives regarding petition for writ of mandamus.				
04-29-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.60	1,160.00		696.00
04-29-2023	RSM		Email communication with TCC counsel regarding petition for writ of mandamus.				
04-29-2023	RSM		B110 - Case Administration	0.30	860.00		258.00
04-29-2023	RSM		Analyzed FCR objection issues.				
04-29-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	860.00		86.00
04-29-2023	RSM		Reviewed Maune Raichle brief in support of motion to dismiss.				
04-29-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	860.00		344.00
04-30-2023	JSM		Correspondence with committee representatives and co-counsel re motion to dismiss discovery strategy.				
04-30-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.60	1,160.00		696.00
04-30-2023	JSM		Email communication with TCC representatives regarding petition for writ of mandamus.				
04-30-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.50	1,160.00		580.00
04-30-2023	RSM		Email communication with TCC counsel regarding petition for writ of mandamus.				
04-30-2023	RSM		B160 - Fee/Employment Application	2.90	860.00		2,494.00
04-30-2023	RSM		Revised draft retention application papers.				
04-30-2023	RSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.30	860.00		258.00
04-30-2023	RSM		Correspondence with committee representatives and co-counsel re mandamus petition arguments.				
04-30-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	860.00		258.00
04-30-2023	RSM		Reviewed ad hoc States committee's motion to dismiss.				
04-30-2023	RSM		B110 - Case Administration	0.20	860.00		172.00
04-30-2023	RSM		Reviewed meso claimants' objection to Debtor's confidentiality designations.				
04-30-2023	RSM		B160 - Fee/Employment Application	0.50	860.00		430.00
04-30-2023	RSM		Correspondence with colleagues re draft retention application papers.				
04-30-2023	RSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.60	860.00		516.00
04-30-2023	JSM		Analyzed Court's written opinion on preliminary injunction.				
04-30-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	1.20	1,160.00		1,392.00
04-30-2023	JSM		Revising petition for writ of mandamus.				
04-30-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.60	1,160.00		696.00
04-30-2023	JSM		Email communication with MoloLamken team regarding petition for writ of mandamus.				
04-30-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.30	1,160.00		348.00
04-30-2023	JSM		Reviewing comments on petition for writ of mandamus from Michelle Parfitt.				
04-30-2023	JSM		B160 - Fee/Employment Application	1.20	1,160.00		1,392.00
04-30-2023	JSM		Revising firm retention application for second bankruptcy.				
04-30-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.50	1,160.00		580.00
04-30-2023	JSM		Zoom with TCC counsel to discuss petition for mandamus.				
04-30-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.20	1,160.00		232.00
04-30-2023	JSM		Reviewing further comments on petition for writ of mandamus from Chris Tisi.				
04-30-2023	JSM		B140 - Relief from Stay / Adequate Protection Proceedings	0.30	1,160.00		348.00

Date	Professional	Task	Exhibit A	Page 16 of 43	Hours	Rate	Amount
Reviewing further comments on petition for writ of mandamus from Dan Lapinski.							
04-30-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.40	1,160.00		464.00
Reviewing further comments on petition for writ of mandamus from Mike Winograd.							
04-30-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	1,160.00		580.00
Reviewing comments on petition for writ of mandamus from Jerry Block.							
05-01-2023	JSM	B110 - Case Administration		0.80	1,160.00		928.00
Reviewing motion to stay proceeding pursuant to 105(a).							
05-01-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.90	1,160.00		2,204.00
Reviewing fraudulent conveyance complaint.							
05-01-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		1.30	1,160.00		1,508.00
Reviewing research on petition for mandamus appellate jurisdiction.							
05-01-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		2.10	1,160.00		2,436.00
Draft memo to TCC counsel regarding mandamus appellate jurisdiction.							
05-01-2023	JSM	B110 - Case Administration		0.30	1,160.00		348.00
Zoom with TCC counsel and other outside counsel re discovery strategy for FCR motion.							
05-01-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00		348.00
Reviewing debtor's letter on MTD scheduling and confidentiality issues.							
05-01-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	485.00		145.50
Analyzing the applicability of actual and constructive fraudulent conveyance to the TCC's complaint.							
05-01-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	860.00		430.00
Correspondence with co-counsel re issues re fraudulent transfer complaint.							
05-01-2023	RSM	B110 - Case Administration		0.90	860.00		774.00
Zoom conference with co-counsel and committee member representatives re FCR discovery issues and preparation for upcoming court hearing.							
05-01-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.10	860.00		946.00
Zoom conference with co-counsel and committee member representatives re motion to dismiss discovery and strategy.							
05-01-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	860.00		172.00
Reviewed Debtor's submission re motion to dismiss case schedule, confidentiality dispute, and common-interest challenge.							
05-01-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	1,160.00		580.00
Reviewing comments on petition for writ of mandamus from Leigh O'Dell.							
05-01-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.60	1,160.00		696.00
Email communication with MoloLamken team regarding petition for writ of mandamus.							
05-01-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		1.20	1,160.00		1,392.00
Prepared final comments on and suggested edits to petition for writ of mandamus.							
05-01-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.90	485.00		436.50
Meeting with co-counsel to discuss strategy re appointment of future claims representative.							
05-01-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings		3.00	485.00		1,455.00
Research regarding whether a petition for writ of mandamus interferes with the power of a lower court to proceed with the case while the appellate court considers the petition.							
05-01-2023	UI	B160 - Fee/Employment Application		0.20	485.00		97.00

Date	Professional	Task	Exhibit A	Page 17 of 43	Hours	Rate	Amount
Review listing of affiliated persons/corporations for potential conflicts and inclusions in retention application.							
05-02-2023	RSM	B160 - Fee/Employment Application			0.20	860.00	172.00
Correspondence with colleagues and local counsel re supplements to retention application.							
05-02-2023	RSM	B110 - Case Administration			0.10	860.00	86.00
Reviewed Kim supplemental declaration re plan support agreements.							
05-02-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.60	860.00	516.00
Analyzed key facts re LTL decision to file for second bankruptcy.							
05-02-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
Reviewed letter submission to court re motion to dismiss discovery sequencing, confidentiality dispute, and common interest challenge.							
05-02-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	860.00	344.00
Analyzed arguments in request for appeal of preliminary injunction ruling.							
05-02-2023	RSM	B110 - Case Administration			0.20	860.00	172.00
Reviewed new document production from LTL re communications with FCR.							
05-02-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.30	1,160.00	1,508.00
Revising introduction to draft fraudulent conveyance complaint.							
05-02-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	1,160.00	232.00
Email communication with TCC counsel re draft fraudulent conveyance complaint.							
05-02-2023	JSM	B160 - Fee/Employment Application			0.20	1,160.00	232.00
Email communication with Don Clarke re retention application.							
05-02-2023	JSM	B160 - Fee/Employment Application			0.30	1,160.00	348.00
Reviewing revised retention application.							
05-02-2023	JSM	B160 - Fee/Employment Application			0.20	1,160.00	232.00
Email communication with Rachel Morse regarding revised retention application.							
05-02-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.50	485.00	242.50
Meeting with J. Massey to discuss legal strategy and status of legal research for motion to dismiss.							
05-02-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
Reviewing revised letter to court on MTD scheduling and confidentiality designations.							
05-02-2023	JSM	B110 - Case Administration			0.80	1,160.00	928.00
Reviewing revised motion to suspend certain deadlines in bankruptcy proceeding.							
05-02-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
Email communication with Gerard Cicero regarding motion to suspend certain deadlines.							
05-02-2023	JSM	B110 - Case Administration			0.60	1,160.00	696.00
Reviewing draft PowerPoint slides for TCC presentation on motion to appoint Randi Ellis as FCR.							
05-02-2023	JSM	B110 - Case Administration			0.20	1,160.00	232.00
Email communication to Gerard Cicero regarding draft PowerPoint slides for TCC presentation on motion to appoint Randi Ellis as FCR.							
05-02-2023	JSM	B110 - Case Administration			1.10	1,160.00	1,276.00
Drafting insert to motion to suspend certain deadlines in bankruptcy proceeding.							
05-02-2023	JSM	B110 - Case Administration			2.40	1,160.00	2,784.00
Revising TCC Opposition to Debtor motion on Scheduling Hearing for Disclosure Statement.							
05-02-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.80	1,160.00	928.00
Zoom with TCC counsel re draft fraudulent conveyance complaint.							
05-02-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
Reviewing motion to intervene of ad hoc committee of counsel supporting debtor.							
05-02-2023	JSM	B110 - Case Administration			0.20	1,160.00	232.00

Date	Professional	Task	Exhibit A	Page 18 of 43	Hours	Rate	Amount
			Email communication with TCC counsel regarding motion to intervene of ad hoc committee of counsel supporting debtor.				
05-02-2023	RA	B110 - Case Administration	Draft M&G Budget and Staffing Plan per requirement of US Trustee.	0.50	320.00	160.00	
05-03-2023	RA	B190 - Other Contested Matters (excluding assumption / rejection motions)	Review DNJ MDL docket for previously filed materials in preparation upcoming MTD briefing.	0.40	320.00	128.00	
05-03-2023	JSM	B110 - Case Administration	Reviewing research in connection with motion to intervene of ad hoc committee of counsel supporting debtor.	0.50	1,160.00	580.00	
05-03-2023	JSM	B110 - Case Administration	Further email communication with TCC counsel regarding motion to intervene of ad hoc committee of counsel supporting debtor.	0.30	1,160.00	348.00	
05-03-2023	JSM	B110 - Case Administration	Attend bankruptcy court hearing zoom on motion to appoint FCR, MTD scheduling, Valadez stay relief motion, and other matters.	4.50	1,160.00	5,220.00	
05-03-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Telephone conference with David Molton re CA3 order requiring LTL to response to mandamus petition by May 8.	0.30	1,160.00	348.00	
05-03-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Telephone conference with Michael Winograd re CA3 order requiring LTL to response to mandamus petition by May 8.	0.30	1,160.00	348.00	
05-03-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Email communication with TCC appellate team re CA3 order requiring LTL to response to mandamus petition by May 8.	0.30	1,160.00	348.00	
05-03-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Email communication with TCC counsel re CA3 order requiring LTL to response to mandamus petition by May 8.	0.30	1,160.00	348.00	
05-03-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Email communication with TCC representatives re CA3 order requiring LTL to response to mandamus petition by May 8.	0.30	1,160.00	348.00	
05-03-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Revising draft fraudulent conveyance derivative standing motion.	2.60	1,160.00	3,016.00	
05-03-2023	JSM	B110 - Case Administration	Reviewing intervention motion by ad hoc committee of law firms supporting debtor.	0.90	1,160.00	1,044.00	
05-03-2023	JSM	B110 - Case Administration	Email communication with TCC counsel regarding intervention motion by ad hoc committee of law firms supporting debtor.	0.40	1,160.00	464.00	
05-03-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Reviewing materials on scientific evidence regarding "non-ovarian gynecological" cancers.	1.40	1,160.00	1,624.00	
05-03-2023	JSM	B110 - Case Administration	Reviewing FCR document discovery produced by debtor.	0.30	1,160.00	348.00	
05-03-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	Analyzing briefing by Johnson & Johnson to identify instances where it drew a distinction between ovarian and non-ovarian "gynecological" cancers.	3.60	485.00	1,746.00	
05-03-2023	RSM	B110 - Case Administration	Correspondence with committee representatives and co-counsel re supporting counsel motion.	0.40	860.00	344.00	
05-03-2023	RSM	B110 - Case Administration	Reviewed AHC motion to intervene.	0.30	860.00	258.00	
05-03-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.10	860.00	1,806.00	

Date	Professional	Task	Exhibit A	Page 19 of 43	Hours	Rate	Amount
			assumption / rejection motions)				
05-03-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	860.00	430.00	
05-03-2023	RSM	Correspondence with committee representatives and co-counsel re analyses of motions to dismiss arguments.		1.20	860.00	1,032.00	
05-03-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Analyzed issues re motion to dismiss discovery needed for hearing.	0.30	860.00	258.00	
05-03-2023	UI	L450 - Trial and Hearing Attendance	Correspondence with co-counsel re next steps after court hearing on motion to dismiss issues.	3.80	485.00	1,843.00	
05-03-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	Attended Court hearing re FCR motion, motion to dismiss discovery disputes, and other matters.	1.40	485.00	679.00	
05-03-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	Drafting email communication to J. Massey and R. Morse synthetizing research regarding case law and record distinguishing between ovarian and non-ovarian gynecological cancers.	4.70	485.00	2,279.50	
05-04-2023	RSM	B110 - Case Administration	Analyzing case law to determine whether courts have included language drawing a distinction between ovarian and non-ovarian "gynecological" cancers.	0.30	860.00	258.00	
05-04-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Correspondence with co-counsel re standing motion/complaint.	0.30	860.00	258.00	
05-04-2023	RSM	B110 - Case Administration	Correspondence with co-counsel re motion to dismiss discovery issues.	0.30	860.00	258.00	
05-04-2023	RSM	B110 - Case Administration	Correspondence with co-counsel re objection to disclosure statement motion.	0.30	860.00	258.00	
05-04-2023	RSM	B110 - Case Administration	Correspondence with co-counsel re case suspension motion.	0.30	860.00	258.00	
05-04-2023	RSM	B110 - Case Administration	Participated in weekly Zoom conference with co-counsel re case developments and priorities.	0.40	860.00	344.00	
05-04-2023	RSM	B110 - Case Administration	Participated in portion of Zoom with committee members, committee representatives, and co-counsel re case priorities and developments.	0.30	860.00	258.00	
05-04-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Analyzed legal arguments re financial distress and fraudulent transfer.	0.40	860.00	344.00	
05-04-2023	RSM	B110 - Case Administration	Reviewed draft motion re Term Sheet.	0.30	860.00	258.00	
05-04-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	Analyzing Johnson & Johnson's briefs to identify any instances it discusses gynecological cancers.	1.30	485.00	630.50	
05-04-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	Review updated version of the Complaint circulated by K. Aulet.	0.80	485.00	388.00	
05-04-2023	UI	B110 - Case Administration	Review updated version of the Standing Motion circulated by K. Aulet.	0.30	485.00	145.50	
05-04-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)	Meeting with co-counsel from various firms to discuss legal strategy on the motion to dismiss.	0.50	485.00	242.50	
05-04-2023	UI	B110 - Case Administration	Meeting with committee members and counsel from various firms and to discuss legal strategy.	1.80	485.00	873.00	
05-04-2023	JSM	B110 - Case Administration	Zoom with TCC counsel re legal strategy and next steps.	0.50	1,160.00	580.00	

Date	Professional	Task	Exhibit A	Page 20 of 43	Hours	Rate	Amount
05-04-2023	JSM	B110 - Case Administration			1.80	1,160.00	2,088.00
		Zoom with TCC representatives and members re legal strategy and next steps.					
05-04-2023	JSM	B320 - Plan and Disclosure Statement (including Business Plan)			1.30	1,160.00	1,508.00
		Reviewing research on scientific evidence regarding non-ovarian gynecological cancers.					
05-04-2023	JSM	B320 - Plan and Disclosure Statement (including Business Plan)			1.10	1,160.00	1,276.00
		Drafting insert to TCC objection to debtor's disclosure statement motion regarding scientific evidence with respect to non-ovarian gynecological cancers.					
05-04-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	1,160.00	464.00
		Email communication with TCC counsel regarding motion to seek derivative standing.					
05-04-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	1,160.00	464.00
		Email communication with TCC counsel regarding draft fraudulent conveyance complaint.					
05-04-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.70	1,160.00	812.00
		Reviewing draft fraudulent conveyance complaint.					
05-04-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.60	1,160.00	696.00
		Reviewing draft derivative standing motion.					
05-04-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	1,160.00	464.00
		Reviewing Ken Aulet comments on draft fraudulent conveyance complaint.					
05-04-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
		Reviewing Dan Stoltz comments on draft fraudulent conveyance complaint.					
05-04-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
		Reviewing Eric Goodman comments on draft motion for derivative standing.					
05-04-2023	JSM	B110 - Case Administration			0.40	1,160.00	464.00
		Reviewing draft mediation order.					
05-04-2023	JSM	B110 - Case Administration			0.40	1,160.00	464.00
		Reviewing draft motion to de-designate Exhibit A of Term Sheet as confidential.					
05-04-2023	JSM	B110 - Case Administration			0.40	1,160.00	464.00
		Reviewing cross-motion to suspend certain aspects of bankruptcy proceeding.					
05-04-2023	JSM	B110 - Case Administration			0.20	1,160.00	232.00
		Reviewing comments from FTI on draft fraudulent transfer complaint.					
05-04-2023	JSM	B110 - Case Administration			0.40	1,160.00	464.00
		Reviewing draft bar date motion from Eric Goodman.					
05-04-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
		Reviewing draft motion to compel discovery of 2021 funding agreement communications between JNJ and LTL.					
05-04-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	1,160.00	232.00
		Reviewing Houlihan Lokey analysis of JNJ stock price as it relates to bankruptcy proceedings.					
05-04-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
		Reviewing draft document requests directed at ad hoc committee of law firms supporting debtor.					
05-05-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	1,160.00	464.00
		Reviewing draft motion for protective order without use restrictions on documents.					
05-05-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.80	1,160.00	928.00
		Zoom with Rachel Morse and Usama Ibrahim regarding preparations for May 9 hearing.					
05-05-2023	JSM	B140 - Relief from Stay / Adequate Protection			0.50	1,160.00	580.00

Date	Professional	Task	Exhibit A	Page 21 of 43	Hours	Rate	Amount
Proceedings							
05-05-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Telephone conference with Mike Winograd regarding arguments on motion to certify direct appeal of PI order at May 9 hearing.	0.20	1,160.00	232.00	
Email communication with TCC counsel regarding Jones Day appearance forms in CA3 mandamus proceeding.							
05-05-2023	JSM	B110 - Case Administration	Reviewing creditor Crouch objection to Russo appointment as mediator.	0.20	1,160.00	232.00	
05-05-2023	JSM	B110 - Case Administration	Reviewing supplemental filing regarding Randi Ellis appointment as FCR.	0.30	1,160.00	348.00	
05-05-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Reviewing revised motion to compel regarding LTL and JNJ assertion of common interest privilege.	0.40	1,160.00	464.00	
05-05-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Reviewing revised motion for protective order without use restrictions.	0.30	1,160.00	348.00	
05-05-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Reviewing revised motion to de-designate Exhibit A to Term Sheet.	0.30	1,160.00	348.00	
05-05-2023	JSM	B110 - Case Administration	Reviewing revised draft mediation order.	0.30	1,160.00	348.00	
05-05-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Email communication with TCC counsel regarding Erik Haas testimony.	0.30	1,160.00	348.00	
05-05-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Email communication with TCC counsel regarding meet and confer for motion to dismiss scheduling and discovery.	0.30	1,160.00	348.00	
05-05-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Reviewing LTL response to TCC letter regarding mediation order.	0.30	1,160.00	348.00	
05-05-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Reviewing response by ad hoc committee of law firms supporting LTL to TCC letter regarding mediation order.	0.30	1,160.00	348.00	
05-05-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	Legal research and analysis re the scope of relevant legal theory.	1.40	485.00	679.00	
05-05-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	Meeting with R. Morse and J. Massey to discuss legal analysis and strategy for relief from stay order.	0.90	485.00	436.50	
05-05-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	Reviewing TCC's motion for an order certifying a direct appeal of the April 20, 2023 preliminary injunction circulated by R. Morse.	0.30	485.00	145.50	
05-05-2023	RSM	B110 - Case Administration	Correspondence with co-counsel re discovery to ad hoc committee.	0.30	860.00	258.00	
05-05-2023	RSM	B110 - Case Administration	Correspondence with co-counsel and committee representatives re draft mediation order.	0.30	860.00	258.00	
05-05-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Correspondence with co-counsel re potential motion in limine for motion to dismiss trial.	0.30	860.00	258.00	
05-05-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	Zoom conference with J. Massey and U. Ibrahim re mandamus and motion to certify direct appeal.	0.90	860.00	774.00	
05-05-2023	RSM	B110 - Case Administration	Zoom conference with J. Massey and U. Ibrahim re mandamus and motion to certify direct appeal.	0.40	860.00	344.00	

Date	Professional	Task	Exhibit A	Page 22 of 43	Hours	Rate	Amount
Correspondence with co-counsel re discovery negotiations with Debtor.							
05-05-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings			0.20	485.00	97.00
Reviewing corresponding exhibits of TCC's motion for an order certifying a direct appeal of the April 20, 2023 Preliminary Injunction circulated by R. Morse.							
05-06-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
Reviewing draft subpoena duces tecum to Onder and Watts firms.							
05-06-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
Email communication with TCC counsel regarding LTL filed statement of affairs.							
05-06-2023	RSM	B110 - Case Administration			0.30	860.00	258.00
Correspondence with co-counsel re J&J's recent court filing re statement of talc claims.							
05-06-2023	RSM	B110 - Case Administration			0.10	860.00	86.00
Reviewed Debtor's and AHCSC's letters to Court re mediation requests.							
05-06-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	1,160.00	348.00
Reviewing motion of ad hoc meso committee to certify direct appeal of PI order at May 9 hearing.							
05-06-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	1,160.00	348.00
Reviewing motion of creditor Crouch to certify direct appeal of PI order at May 9 hearing.							
05-07-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			2.20	1,160.00	2,552.00
Drafting PowerPoint slides for argument on motion to certify direct appeal of PI order at May 9 hearing.							
05-07-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	1,160.00	232.00
Email communication with TCC counsel re counter-proposal to MTD schedule.							
05-07-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	860.00	258.00
Correspondence with committee representatives and co-counsel re MTD discovery issues.							
05-07-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	860.00	86.00
Reviewed correspondence from AHC counsel re motion to dismiss discovery requests.							
05-08-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings			1.60	485.00	776.00
Researching the requirements of § 158(d)(2)(A) for purposes of a controlling appellate decision as raised in Debtor's omnibus objection to motions for an order certifying direct appeal of preliminary injunction order to the Third Circuit.							
05-08-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.50	860.00	1,290.00
Zoom conference with committee representatives and co-counsel re motion to dismiss discovery issues.							
05-08-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	860.00	86.00
Correspondence with committee representatives and co-counsel re Debtor's assertions re attorney advertising.							
05-08-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.20	860.00	172.00
Analyzed issues re Debtor's objection to motion re certification of direct appeal.							
05-08-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
Correspondence with committee representatives and co-counsel re motion to dismiss discovery requests.							
05-08-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.20	860.00	172.00
Correspondence with committee representatives and co-counsel re ad hoc committee opposition to writ of mandamus.							
05-08-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings			2.70	485.00	1,309.50
Analyzing Debtor's omnibus objection to motions for an order certifying direct appeal of preliminary injunction order to the Third Circuit.							
05-08-2023	UI	B190 - Other Contested Matters (excluding			1.50	485.00	727.50

Date	Professional	Task	Exhibit A	Page 23 of 43	Hours	Rate	Amount
			assumption / rejection motions)				
05-08-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Meeting with M. Winograd, M. Reining, inter alia, to discuss legal strategy for motion to dismiss.	1.80	1,160.00	2,088.00	
05-08-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Reviewing LTL opposition to motion to certify direct appeal.	1.90	1,160.00	2,204.00	
05-08-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Reviewing LTL response to mandamus petition.	2.10	1,160.00	2,436.00	
05-08-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Drafting reply in support of mandamus petition.	4.30	1,160.00	4,988.00	
05-08-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Drafting PowerPoint for May 9 hearing regarding motion to certify direct appeal.	0.60	1,160.00	696.00	
05-08-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Teleconference with TCC appellate counsel regarding LTL response to petition for mandamus.	0.30	1,160.00	348.00	
05-08-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Email communication with TCC appellate team regarding mandamus reply brief.	0.20	1,160.00	232.00	
05-08-2023	JSM	B110 - Case Administration	Email communication with TCC representatives regarding mandamus response filed by LTL.	0.30	1,160.00	348.00	
05-08-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	Revising TCC objection to motion to intervene filed by ad hoc committee of law firms supporting debtor.	1.20	485.00	582.00	
05-08-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings	Analyzing debtor's argument in omnibus objection for an order certifying direct appeal of PI to assess whether there is a legal distinction between a certified appeal and the relief sought by the mandamus petition.	1.60	485.00	776.00	
05-09-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Researching the "public importance" prong of 28 U.S.C. § 158(d)(2)(A)(i) and its applicability to the contested preliminary injunction.	0.20	1,160.00	232.00	
05-09-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	Email communication with TCC appellate counsel regarding reply brief in support of mandamus.	0.20	1,160.00	232.00	
05-09-2023	JSM	B110 - Case Administration	Email communication with TCC counsel regarding logistics for hearing on motion to certify direct appeal of PI order.	3.40	1,160.00	3,944.00	
05-09-2023	JSM	B110 - Case Administration	Attending bankruptcy court hearing on motion to certify direct appeal (argued by me), motion of ad hoc committee to intervene, MTD scheduling, FCR ruling.	1.10	1,160.00	1,276.00	
05-09-2023	JSM	B195 - Non-Working Travel	Meeting with TCC counsel and representatives to discuss next steps in light of bankruptcy court hearing on motion to certify direct appeal, motion of ad hoc committee to intervene, MTD scheduling, FCR ruling.	6.80	580.00	3,944.00	
05-09-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	Travel in connection with bankruptcy court hearing on motion to certify direct appeal, motion of ad hoc committee to intervene, MTD scheduling, FCR ruling.	0.30	860.00	258.00	
05-09-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	Correspondence with co-counsel re mandamus issues.	1.20	860.00	1,032.00	
05-09-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	Attended remotely portion of Court hearing re petition for direct appeal and intervenor motion.	0.30	860.00	258.00	

Date	Professional	Task	Exhibit A	Page 24 of 43	Hours	Rate	Amount
			Correspondence with co-counsel re arguments re solvency issues for appeal.				
05-09-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	860.00		258.00
			Reviewed ad hoc committee's omnibus objection to motions for direct certification of appeal.				
05-09-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	860.00		258.00
			Reviewed powerpoint slide deck re presentation on motion for direct certification of appeal.				
05-09-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	860.00		258.00
			Reviewed U. Ibrahim's analysis re legal arguments on motion for direct certification of appeal.				
05-09-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	485.00		194.00
			Analyzing MOAC Mall Holdings LLC v. Transform Holdco LLC, 143 S. Ct. 927 (2023)'s holding regarding standing on this bankruptcy proceeding.				
05-09-2023	UI	B110 - Case Administration		0.30	485.00		145.50
			Preparing copies of PowerPoint presentations for J. Massey, co-counsel, opposing counsel, and the Court for Massey's forthcoming advocacy before the Honorable Michael B. Kaplan.				
05-09-2023	UI	L450 - Trial and Hearing Attendance		3.60	485.00		1,746.00
			Attendance in Court hearing re, inter alia, the certification of PI appeal to the Third Circuit.				
05-10-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.70	485.00		339.50
			Researching case law regarding actual fraudulent conveyance for the motion to dismiss.				
05-10-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings		0.70	485.00		339.50
			Meeting with J. Massey to discuss potential legal strategies for MTD trial.				
05-10-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.00	485.00		485.00
			Meeting with co-counsel from various firms to discuss legal strategy on the motion to dismiss.				
05-10-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.10	485.00		1,018.50
			Meeting with committee and co-counsel from various firms to discuss legal strategy on the motion to dismiss.				
05-10-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.80	485.00		388.00
			Analyzing subpoenas served on M. Nachawati to understand text sent to D. Stolz.				
05-10-2023	JSM	B110 - Case Administration		1.00	1,160.00		1,160.00
			Zoom with TCC counsel to discuss next steps and legal strategy.				
05-10-2023	JSM	B110 - Case Administration		1.90	1,160.00		2,204.00
			Zoom with TCC members and representatives to discuss next steps and legal strategy.				
05-10-2023	RSM	B110 - Case Administration		0.70	860.00		602.00
			Participated in weekly Zoom with co-counsel re case priorities and strategy.				
05-10-2023	RSM	B110 - Case Administration		1.00	860.00		860.00
			Participated in portion of weekly videoconference with committee members, committee member representatives, and co-counsel re case strategy and preparing for motion to dismiss hearing.				
05-10-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	860.00		172.00
			Correspondence with co-counsel re preparation for motion to dismiss hearing.				
05-10-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.80	1,160.00		928.00
			Investigate and assess possible TCC expert witnesses for MTD trial.				
05-10-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.70	1,160.00		812.00
			Discussion with Usama Ibrahim re potential legal strategies for MTD trial.				
05-10-2023	JSM	B160 - Fee/Employment Application		0.20	1,160.00		232.00
			Communication with legal assistant regarding payment of PHV fee.				
05-10-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.90	1,160.00		1,044.00

Date	Professional	Task	Exhibit A	Page 25 of 43	Hours	Rate	Amount
Reviewing briefing on 1112(b) "unusual circumstances"/"best interest of creditors" test for MTD hearing.							
05-10-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.60	1,160.00	696.00
Reviewing MOAC Holding Supreme Court case cited by Bankruptcy Court for MTD hearing.							
05-10-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
Reviewing Jones Day retention application for arguments relevant to MTD hearing.							
05-10-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
Reviewing draft letter re MTD scheduling order.							
05-10-2023	JSM	B110 - Case Administration			0.20	1,160.00	232.00
Reviewing proposed order appointing FCR.							
05-10-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
Email communication with TCC counsel regarding discovery in preparation for motion to dismiss trial.							
05-10-2023	JSM	B320 - Plan and Disclosure Statement (including Business Plan)			1.40	1,160.00	1,624.00
Reviewing draft TCC reorganization plan.							
05-10-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	485.00	194.00
Reviewing email communication from D. Stoltz regarding text received from M. Nachawati.							
05-10-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.60	485.00	291.00
Researching case law regarding constructive fraudulent conveyance for the motion to dismiss.							
05-11-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			3.60	485.00	1,746.00
Researching the Third Circuit's application of § 1112's best interest of the creditor provision in Chapter 7 and 11 proceedings for the motion to dismiss trial.							
05-11-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
Reviewing proposed order for intervention motion by ad hoc committee supporting debtor.							
05-11-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
Reviewing LTL objection to TCC motion for protective order.							
05-11-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	1,160.00	464.00
Email communication with Jeff Lamken re preparation for MTD trial.							
05-11-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
Reviewing draft subpoenas for financial institutions.							
05-11-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.60	1,160.00	1,856.00
Reviewing draft derivative standing motion.							
05-11-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.80	1,160.00	2,088.00
Reviewing draft fraudulent conveyance complaint.							
05-11-2023	RSM	B160 - Fee/Employment Application			1.20	860.00	1,032.00
Worked on fee application for April services.							
05-11-2023	UI	B110 - Case Administration			1.30	485.00	630.50
Reviewing filed standing motion as circulated by E. Goodman.							
05-11-2023	RSM	B110 - Case Administration			1.40	860.00	1,204.00
Attended portion of 314 meeting.							
05-11-2023	RSM	B110 - Case Administration			0.30	860.00	258.00
Correspondence with co-counsel re draft order on motion to intervene.							
05-11-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.20	1,160.00	232.00
Reviewing LTL proposed order denying motion certify direct appeal.							
05-11-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00

Date	Professional	Task	Exhibit A	Page 26 of 43	Hours	Rate	Amount
			Reviewing draft bar date motion from Brown Rudnick.				
05-11-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
			Reviewing fact witness list for MTD trial.				
05-11-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
			Reviewing fact witness list for MTD trial.				
05-11-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
			Reviewing draft objection to discovery directed at TCC.				
05-11-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
			Reviewing draft objection to discovery directed at TCC.				
05-11-2023	JSM		B110 - Case Administration		0.20	1,160.00	232.00
			Email communication with Eric Goodman regarding estimation strategy.				
05-11-2023	JSM		B110 - Case Administration		0.20	1,160.00	232.00
			Reviewing revised draft order allowing intervention of ad hoc committee supporting debtor.				
05-12-2023	JSM		B320 - Plan and Disclosure Statement (including Business Plan)		0.50	1,160.00	580.00
			Reviewing draft exclusivity vacatur motion.				
05-12-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
			Reviewing Onderlaw objections to TCC subpoena.				
05-12-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	1,160.00	232.00
			Reviewing Nachawati objections to TCC subpoena.				
05-12-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		1.20	1,160.00	1,392.00
			Drafting list of factual issues to be proven at MTD hearing.				
05-12-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		1.10	1,160.00	1,276.00
			Meeting with Usama Ibrahim to discuss legal strategy for MTD hearing.				
05-12-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
			Reviewing draft subpoenas to financial institutions for MTD trial.				
05-12-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
			Email communication with TCC representatives re draft subpoenas to financial institutions for MTD trial.				
05-12-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
			Reviewing objection of ad hoc committee of counsel supporting debtor to TCC cross-motion.				
05-12-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
			Reviewing reply and statement in support of disclosure statement by ad hoc committee of counsel supporting debtor.				
05-12-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	1,160.00	232.00
			Reviewing debtor response to TCC letter regarding MTD schedule and procedure.				
05-12-2023	JSM		B160 - Fee/Employment Application		0.10	1,160.00	116.00
			Reviewing debtor reservation of rights regarding TCC retentions.				
05-12-2023	UI		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	485.00	194.00
			Drafting internal memorandum synthesizing research findings on applicability of § 1112 for forthcoming motion to dismiss trial.				
05-12-2023	UI		B190 - Other Contested Matters (excluding assumption / rejection motions)		1.10	485.00	533.50

Date	Professional	Task	Exhibit A	Page 27 of 43	Hours	Rate	Amount
Discussion with J. Massey re potential legal strategies for MTD trial.							
05-12-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
Correspondence with co-counsel re standing motion.							
05-12-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
Conference with J. Massey re next steps in preparing for motion to dismiss work.							
05-12-2023	RSM	B110 - Case Administration			0.10	860.00	86.00
Reviewed Debtor's motion for protective order prohibiting use of its documents outside the bankruptcy.							
05-13-2023	RSM	B110 - Case Administration			0.20	860.00	172.00
Reviewed motion to compel unredacted documents.							
05-13-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	860.00	86.00
Reviewed Maune Raichle letter submission to Court re motion to dismiss trial.							
05-13-2023	RSM	B110 - Case Administration			0.10	860.00	86.00
Correspondence with J. Massey re non-party subpoenas.							
05-13-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	860.00	86.00
Reviewed Debtor's letter submission to Court re motion to dismiss trial.							
05-13-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	860.00	86.00
Reviewed TCC's letter submission to Court re motion to dismiss trial.							
05-13-2023	RSM	B110 - Case Administration			0.20	860.00	172.00
Reviewed Debtor's cross-motion for protective order.							
05-13-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	860.00	86.00
Reviewed Debtor objection to TCC cross-motion to temporarily suspend case.							
05-13-2023	RSM	B110 - Case Administration			0.10	860.00	86.00
Reviewed Debtor's reply in support of scheduling motion re disclosure statement.							
05-13-2023	RSM	B110 - Case Administration			0.10	860.00	86.00
Reviewed ad hoc committee's objection to TCC cross-motion to suspend case.							
05-13-2023	RSM	B110 - Case Administration			0.10	860.00	86.00
Reviewed ad hoc committee's reply in support of disclosure scheduling motion.							
05-13-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	1,160.00	232.00
Email communication with Mike Winograd re TCC motion to compel.							
05-13-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
Reviewing draft TCC motion to compel unredacted documents.							
05-13-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
Email communication with TCC counsel and representatives regarding Kenvue.							
05-14-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.70	485.00	1,309.50
Researching Section 1112(b)(1)'s two-step analysis for the motion to dismiss trial.							
05-14-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	1,160.00	232.00
Email communication with TCC counsel re subpoenas to be served on financial institutions in connection with MTD trial.							
05-14-2023	JSM	B110 - Case Administration			0.20	1,160.00	232.00
Email communication with TCC counsel re LTL Opposition to TCC Cross-Motion on Use Restriction of documents designated confidential.							
05-14-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	860.00	86.00
Correspondence with co-counsel and committee representatives re non-party subpoenas for motion to dismiss.							
05-14-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	860.00	86.00

Date	Professional	Task	Exhibit A	Page 28 of 43	Hours	Rate	Amount
			assumption / rejection motions)				
05-14-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	485.00		145.50
05-14-2023	UI	Reviewing summary of AHC Law Firms Retention Terms circulated by Sunni P. Beville.		0.70	485.00		339.50
05-15-2023	UI	Reviewing J. Onder and OnderLaw LLC's Objections and Response to the TCC's Subpoena circulated by David J. Molton.		1.70	485.00		824.50
05-15-2023	UI	Researching whether solvency is a requirement for seeking bankruptcy protections in preparation for MTD trial.		3.90	242.50		945.75
05-15-2023	UI	Travel from Washington, D.C. to New York City for in-person strategy session with co-counsel to discuss motion to dismiss trial.					
05-15-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.80	485.00		388.00
05-15-2023	UI	Meeting with co-counsel to discuss legal strategy on estimation.		4.20	485.00		2,037.00
05-15-2023	JSM	Researching the "best interest of creditors" test in Section 1112(b) in preparation for MTD trial.		0.70	1,160.00		812.00
05-15-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.60	1,160.00		696.00
05-15-2023	JSM	Analyzing research on "best interest of creditors" test in Section 1112(b) in preparation for MTD trial.					
05-15-2023	JSM	B110 - Case Administration		0.70	1,160.00		812.00
05-15-2023	JSM	Reviewing current version of bar date motion.					
05-15-2023	JSM	B320 - Plan and Disclosure Statement (including Business Plan)		0.30	485.00		145.50
05-15-2023	UI	Reviewing current version of motion to terminate exclusivity.					
05-15-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	485.00		145.50
05-15-2023	UI	Drafting email communication to J. Massey synthesizing research on whether solvency is a requirement for seeking bankruptcy protections in preparation for MTD trial.					
05-15-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	485.00		145.50
05-15-2023	JSM	Reviewing LTL Management's Plan of Reorganization circulated by Susan Sieger-Grimm.					
05-15-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	1,160.00		232.00
05-15-2023	JSM	Reviewing JNJ response to TCC motion to compel production of unredacted documents.					
05-15-2023	JSM	B195 - Non-Working Travel		3.70	580.00		2,146.00
05-15-2023	JSM	Non-working travel to NYC for Brown Rudnick meeting to discuss legal strategy and next steps.					
05-15-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00		348.00
05-15-2023	JSM	Email communication with Gerard Cicero regarding 524(g) as it applies to MTD arguments.					
05-15-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	1,160.00		464.00
05-15-2023	JSM	Analyzing legal research on tests for insolvency vs. financial distress.					
05-15-2023	JSM	B110 - Case Administration		0.50	1,160.00		580.00
05-15-2023	RSM	Reviewing draft TCC reply in support of cross motion to suspend case.					
05-15-2023	RSM	B110 - Case Administration		0.10	860.00		86.00
05-15-2023	RSM	Reviewed Court order re hearing on discovery motions.					
05-15-2023	RSM	B110 - Case Administration		0.10	860.00		86.00
05-15-2023	RSM	Reviewed Ruckdeschel written responses and objections to Debtor's document requests.					
05-15-2023	RSM	B110 - Case Administration		0.30	860.00		258.00
05-15-2023	RSM	Analyzed draft responses to interrogatories directed to the TCC.					
05-15-2023	RSM	B110 - Case Administration		0.30	860.00		258.00

Date	Professional	Task	Exhibit A	Page 29 of 43	Hours	Rate	Amount
			Reviewed draft responses to Debtor's document requests directed to the TCC.				
05-15-2023	RSM	B110 - Case Administration		0.70	860.00	602.00	
			Revised draft reply in support of cross-motion re Debtor's disclosure statement.				
05-15-2023	RSM	B110 - Case Administration		0.20	860.00	172.00	
			Correspondence with co-counsel re draft reply in support of cross-motion re Debtor's disclosure statement.				
05-15-2023	RSM	B110 - Case Administration		0.20	860.00	172.00	
			Reviewed TCC objection to Debtor's cross-motion for protective order re confidential information.				
05-15-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.80	860.00	688.00	
			Revised draft motion to terminate exclusivity.				
05-15-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	860.00	172.00	
			Correspondence with co-counsel re motion to terminate exclusivity.				
05-15-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.00	860.00	860.00	
			Zoom with co-counsel re case strategies for addressing Debtor's plan.				
05-15-2023	RSM	B110 - Case Administration		0.30	860.00	258.00	
			Reviewed J&J's objection to TCC motion to compel.				
05-15-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	860.00	258.00	
			Analyzed legal strategy for addressing Debtor's plan.				
05-16-2023	RSM	B110 - Case Administration		0.20	860.00	172.00	
			Correspondence with co-counsel re Debtor's plan disclosure.				
05-16-2023	RSM	B110 - Case Administration		1.90	860.00	1,634.00	
			Attended remotely portion of Court hearing re plan disclosure and discovery motions re motion to dismiss.				
05-16-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.40	860.00	1,204.00	
			Participated remotely in conference with co-counsel re global planning for motion to dismiss hearing.				
05-16-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	860.00	344.00	
			Analyzed portion of court record from first bankruptcy re funding agreement effect.				
05-16-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	860.00	172.00	
			Reviewed proposed competing draft pretrial schedules for motion to dismiss hearing.				
05-16-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	860.00	344.00	
			Reviewed U. Ibrahim's research analysis re fraudulent conveyance argument.				
05-16-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	860.00	172.00	
			Reviewed Debtor's objection to TCC motion to compel.				
05-16-2023	JSM	B110 - Case Administration		2.80	1,160.00	3,248.00	
			Attend bankruptcy court hearing remotely on MTD scheduling, confidentiality issues, redaction, and other issues.				
05-16-2023	JSM	B110 - Case Administration		0.50	1,160.00	580.00	
			Meet with Gerard Cicero and other Brown Rudnick attorneys regarding next steps and legal strategy.				
05-16-2023	JSM	B110 - Case Administration		3.80	1,160.00	4,408.00	
			Meet with TCC counsel regarding next steps and legal strategy.				
05-16-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00	
			Email communication with TCC counsel re MTD schedule.				
05-16-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00	
			Revising draft responses to LTL's interrogatories to TCC.				
05-16-2023	JSM	B195 - Non-Working Travel		3.60	580.00	2,088.00	
			Travel back to DC after TCC counsel meeting in NY at Brown Rudnick.				

Date	Professional	Task	Exhibit A	Page 30 of 43	Hours	Rate	Amount
05-16-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
		Reviewing proposed order allowing intervention of ad hoc committee of law firms supporting debtor.					
05-16-2023	UI	B110 - Case Administration			0.40	485.00	194.00
		Reviewing March 8, 2022 LTL 1.0 bankruptcy proceeding transcript circulated by Gerard T. Cicero.					
05-16-2023	UI	L450 - Trial and Hearing Attendance			3.10	485.00	1,503.50
		Attended bankruptcy court hearing re motion to dismiss, suspension, and disclosure statement scheduling, and other matters.					
05-16-2023	UI	B195 - Non-Working Travel			4.20	242.50	1,018.50
		Travel from New York City to Washington, D.C.					
05-16-2023	UI	B195 - Non-Working Travel			1.10	242.50	266.75
		Travel from the offices of Brown Rudnick LLP to the rental car agency.					
05-16-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.70	485.00	1,309.50
		Post-hearing strategy session with co-counsel to discuss strategy for motion to dismiss trial.					
05-16-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.00	485.00	485.00
		Legal research on whether solvency is a requirement for seeking bankruptcy protections in preparation for MTD trial.					
05-17-2023	RSM	B110 - Case Administration			0.40	860.00	344.00
		Attended town hall meeting for talc claimants.					
05-17-2023	RSM	B320 - Plan and Disclosure Statement (including Business Plan)			0.30	860.00	258.00
		Correspondence with co-counsel re issues re claims calculations.					
05-17-2023	RSM	B110 - Case Administration			0.10	860.00	86.00
		Reviewed draft agenda for meeting with committee representatives re case progress and strategy.					
05-17-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
		Correspondence with co-counsel re preparing for likely dispute at motion to dismiss hearing.					
05-17-2023	RSM	B110 - Case Administration			1.30	860.00	1,118.00
		Participated in weekly Zoom with co-counsel and committee member representatives re case developments, priorities, and strategies.					
05-17-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.50	860.00	430.00
		Analyzed argument in support of motion to dismiss re financial distress.					
05-17-2023	UI	B110 - Case Administration			0.40	485.00	194.00
		Reviewing updated Bar Date Motion circulated by Eric R. Goodman.					
05-17-2023	UI	B110 - Case Administration			0.40	485.00	194.00
		Discussion with L. Goldman re Collier's bankruptcy treatise for motion to dismiss trial.					
05-17-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.20	1,160.00	232.00
		Email communication with Michael Reining re designation of record and statement of issues for appeal of PI order in district court.					
05-17-2023	JSM	B320 - Plan and Disclosure Statement (including Business Plan)			2.10	1,160.00	2,436.00
		Reviewing debtor's disclosure statement.					
05-17-2023	JSM	B320 - Plan and Disclosure Statement (including Business Plan)			1.90	1,160.00	2,204.00
		Reviewing debtor's proposed plan.					
05-17-2023	JSM	B110 - Case Administration			1.80	1,160.00	2,088.00
		Zoom with TCC representatives and members to discuss next steps and legal strategy.					
05-17-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.50	1,160.00	580.00
		Telephone conference with Jeff Lamken to discuss MTD trial.					
05-17-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.60	1,160.00	1,856.00

Date	Professional	Task	Exhibit A	Page 31 of 43	Hours	Rate	Amount
			Reviewing legal research regarding Section 1112(b) in response to bankruptcy court's comments at May 16 hearing.				
05-17-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.20	1,160.00	2,552.00	
			Drafting brief regarding Section 1112(b)(2) in response to bankruptcy court's comments at May 16 hearing.				
05-17-2023	JSM	B310 - Claims Administration and Objections		0.60	1,160.00	696.00	
			Revising latest version of bar date motion draft from Brown Rudnick.				
05-17-2023	JSM	B320 - Plan and Disclosure Statement (including Business Plan)		0.50	1,160.00	580.00	
			Revising latest version of motion to terminate exclusivity from Brown Rudnick.				
05-18-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		3.00	485.00	1,455.00	
			Researching cases that interpret the "reasonable justification" and "cure" language of 1112(b)(2) for the motion to dismiss trial.				
05-18-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		4.10	1,160.00	4,756.00	
			Drafting brief regarding Section 1112(b)(2) in response to bankruptcy court's comments at May 16 hearing.				
05-18-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	1,160.00	348.00	
			Email communication with Michael Reining re designation of record and statement of issues for appeal of PI order in district court.				
05-18-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	1,160.00	348.00	
			Reviewing designation of record for appeal of PI order in district court.				
05-18-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.70	1,160.00	812.00	
			Drafting statement of issues for appeal of PI order in district court.				
05-18-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	1,160.00	232.00	
			Reviewing draft witness list for MTD trial.				
05-18-2023	RSM	B110 - Case Administration		0.10	860.00	86.00	
			Correspondence with committee member representatives and co-counsel re draft discovery responses.				
05-18-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.60	485.00	291.00	
			Reviewing MTD Hearing 2.0 Witness List circulated by Michael S. Winograd.				
05-18-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	485.00	242.50	
			Meeting with J. Massey to discuss legal strategy for MTD hearing.				
05-18-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.10	485.00	48.50	
			Drafting email communication to D. Castleman re motion to dismiss trial strategy meeting.				
05-18-2023	UI	B140 - Relief from Stay / Adequate Protection Proceedings		0.20	485.00	97.00	
			Reviewing order appointing Randi S. Ellis as FCR circulated by Gregory S. Kinoian.				
05-19-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	860.00	172.00	
			Correspondence with co-counsel re Section 1112 argument.				
05-19-2023	RSM	B110 - Case Administration		0.20	860.00	172.00	
			Correspondence with co-counsel re analysis of claimant lists.				
05-19-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	860.00	172.00	
			Analyzed argument re Section 1112 issue.				
05-19-2023	RSM	B160 - Fee/Employment Application		0.10	860.00	86.00	
			Correspondence with counsel for Debtor re fee application.				
05-19-2023	RSM	B110 - Case Administration		0.20	860.00	172.00	
			Reviewed proposed court order re interim compensation.				

Date	Professional	Task	Exhibit A	Page 32 of 43	Hours	Rate	Amount
05-19-2023	RSM	B160 - Fee/Employment Application			0.10	860.00	86.00
		Correspondence with colleagues re fee application.					
05-19-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	860.00	86.00
		Reviewed draft witness list for motion to dismiss.					
05-19-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.90	485.00	436.50
		Meeting with co-counsel to discuss legal strategy for forthcoming motion to dismiss trial.					
05-19-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	485.00	97.00
		Meeting with J. Massey to discuss legal strategy for MTD hearing.					
05-19-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.70	485.00	824.50
		Reviewing Collier's bankruptcy treatise for discussion on Section 1112 for motion to dismiss trial.					
05-19-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.00	1,160.00	1,160.00
		Zoom with Otterbourg team to discuss Section 1112(b)(2) issues.					
05-19-2023	JSM	B110 - Case Administration			0.20	1,160.00	232.00
		Reviewing draft notice of appeal from order appointing Randi Ellis.					
05-19-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			6.30	1,160.00	7,308.00
		Drafting brief regarding Section 1112(b)(2) in response to bankruptcy court's comments at May 16 hearing.					
05-19-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	485.00	97.00
		Reviewing MTD Hearing 2.0 Witness List circulated by Michael S. Winograd.					
05-19-2023	RA	B110 - Case Administration			0.60	320.00	192.00
		Review recently produced Debtor's document production.					
05-20-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			3.70	1,160.00	4,292.00
		Continued drafting brief regarding Section 1112(b)(2) in response to bankruptcy court's comments at May 16 hearing.					
05-20-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
		Correspondence with co-counsel re motion to dismiss discovery work.					
05-21-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	485.00	194.00
		Reviewing Order Establishing Case Management and Administrative Procedures circulated by Harriet E. Cohen.					
05-21-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			4.20	1,160.00	4,872.00
		Further continued drafting brief regarding Section 1112(b)(2) in response to bankruptcy court's comments at May 16 hearing.					
05-21-2023	JSM	B160 - Fee/Employment Application			0.20	1,160.00	232.00
		Reviewing fee statement for April services.					
05-21-2023	JSM	B160 - Fee/Employment Application			0.20	1,160.00	232.00
		Revising fee statement for April services.					
05-21-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.20	485.00	582.00
		Reviewing LTL Management's Plan of Reorganization circulated by Susan Sieger-Grimm.					
05-22-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			4.40	1,160.00	5,104.00
		Revising brief regarding Section 1112(b)(2) in response to bankruptcy court's comments at May 16 hearing.					
05-22-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.10	1,160.00	1,276.00
		Zoom with Brown Rudnick and Otterbourg teams regarding 1112(b)(2) issues.					
05-22-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.50	1,160.00	580.00

Date	Professional	Task	Exhibit A	Page 33 of 43	Hours	Rate	Amount
			assumption / rejection motions)				
05-22-2023	JSM		Zoom with David Castleman of Otterbourg regarding 1112(b)(2) issues.		0.20	1,160.00	232.00
			B190 - Other Contested Matters (excluding assumption / rejection motions)				
05-22-2023	JSM		Reviewing draft TCC letter to court regarding discovery issues.		0.30	1,160.00	348.00
			B160 - Fee/Employment Application				
05-22-2023	JSM		Email communication with Office of the US Trustee regarding revised retention application.		0.20	1,160.00	232.00
			B160 - Fee/Employment Application				
05-22-2023	UI		Email communication with Rachel Morse regarding revised retention application.		1.00	485.00	485.00
			B190 - Other Contested Matters (excluding assumption / rejection motions)				
			Discussion with co-counsel to address applicability of Section 1112(b) to motion to dismiss trial.				
05-22-2023	UI		B190 - Other Contested Matters (excluding assumption / rejection motions)		1.10	485.00	533.50
			Reviewing Collier's bankruptcy treatise for discussion on Section 1112 for motion to dismiss trial.				
05-22-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	860.00	258.00
			Correspondence with committee member representatives re potential bar date motion.				
05-22-2023	RSM		B110 - Case Administration		0.30	860.00	258.00
			Correspondence with committee member representatives re draft model claim form.				
05-22-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	860.00	344.00
			Correspondence with co-counsel re discovery negotiations with LTL's counsel.				
05-22-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	860.00	258.00
			Correspondence with committee member representatives re potential motion to terminate exclusivity.				
05-22-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		1.00	860.00	860.00
			Zoom conference with co-counsel re Section 1112 arguments.				
05-22-2023	RSM		B160 - Fee/Employment Application		1.10	860.00	946.00
			Drafted supplemental certification in support of retention application per UST request.				
05-22-2023	RSM		B160 - Fee/Employment Application		0.20	860.00	172.00
			Drafted new proposed order re retention per UST request.				
05-22-2023	RSM		B160 - Fee/Employment Application		0.30	860.00	258.00
			Drafted new D.2 declaration for committee representatives re retention per UST request.				
05-22-2023	RSM		B160 - Fee/Employment Application		0.30	860.00	258.00
			Correspondence with colleagues re information for supplemental certification in support of retention application.				
05-23-2023	RSM		B160 - Fee/Employment Application		0.20	860.00	172.00
			Correspondence with local counsel re supplemental retention papers per UST request.				
05-23-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	860.00	258.00
			Correspondence with co-counsel and committee member representatives re statute of limitations arguments.				
05-23-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	860.00	430.00
			Analyzed issues for offensive depositions re motion to dismiss.				
05-23-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	860.00	258.00
			Correspondence with co-counsel and committee member representatives re strategies for offensive depositions.				
05-23-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	860.00	258.00
			Reviewed draft discovery dispute letter submission to the Court.				
05-23-2023	RSM		B160 - Fee/Employment Application		0.80	860.00	688.00
			Revised draft supplemental retention papers per UST request.				
05-23-2023	RSM		B160 - Fee/Employment Application		0.90	860.00	774.00

Date	Professional	Task	Exhibit A	Page 34 of 43	Hours	Rate	Amount
Drafted guidelines for co-counsel on coordination of efforts per retention application guidelines.							
05-23-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	485.00	97.00
Meeting with J. Massey to discuss legal strategy for MTD hearing.							
05-23-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	485.00	97.00
Reviewing email communication from Daniel M. Stolz regarding applicability of Section 1112(b) to motion to dismiss trial.							
05-23-2023	SD	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.40	500.00	700.00
Analyze federal law regarding the distribution of courts which do not consider the possibility of successful reorganization as a consideration regarding whether a chapter 11 filing was made in bad faith.							
05-23-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	485.00	145.50
Reviewing LTL's Monthly Operating Report circulated by Daniel M. Stolz.							
05-23-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	485.00	145.50
Drafting email communication to J. Massey regarding scope of Section 1112(b)(2) curability.							
05-23-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			4.60	1,160.00	5,336.00
Revising brief regarding Section 1112(b)(2) in response to bankruptcy court's comments at May 16 hearing.							
05-23-2023	JSM	B160 - Fee/Employment Application			0.30	1,160.00	348.00
Email communication with Office of the US Trustee regarding revised retention application.							
05-23-2023	JSM	B160 - Fee/Employment Application			0.30	1,160.00	348.00
Reviewing staffing plan and budget.							
05-23-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	1,160.00	232.00
Email communication with Jeff Lamken re MTD arguments.							
05-23-2023	JSM	B320 - Plan and Disclosure Statement (including Business Plan)			0.40	1,160.00	464.00
Reviewing Brown Rudnick PowerPoint re summary of problems with Debtor's proposed plan.							
05-23-2023	RA	B110 - Case Administration			0.30	320.00	96.00
Review recently produced Debtor's document production.							
05-23-2023	RA	B160 - Fee/Employment Application			0.50	320.00	160.00
Draft M&G monthly fee statement for April 2023.							
05-23-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.10	485.00	1,018.50
Researching cases that interpret the "reasonable justification" and "cure" language of 1112(b)(2) for the motion to dismiss trial.							
05-23-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.20	485.00	1,067.00
Researching cases that interpret the curability of fraud in bankruptcy proceedings for the motion to dismiss trial.							
05-24-2023	RA	B160 - Fee/Employment Application			0.30	320.00	96.00
Revise draft M&G monthly fee statement for April 2023.							
05-24-2023	RA	B110 - Case Administration			0.30	320.00	96.00
Continue to review recently produced Debtor's document production.							
05-24-2023	JSM	B160 - Fee/Employment Application			0.30	1,160.00	348.00
Revising supplemental Massey certification.							
05-24-2023	JSM	B160 - Fee/Employment Application			0.40	1,160.00	464.00
Revising April invoice.							
05-24-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			4.70	1,160.00	5,452.00
Drafting insert to MTD reply.							
05-24-2023	JSM	B160 - Fee/Employment Application			0.30	1,160.00	348.00
Reviewing revised retention submission.							
05-24-2023	RSM	B110 - Case Administration			0.20	860.00	172.00

Date	Professional	Task	Exhibit A	Page 35 of 43	Hours	Rate	Amount
Correspondence with co-counsel re coordination of efforts, per UST guidelines and requests.							
05-24-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	860.00	258.00
Correspondence with co-counsel and committee member representatives re strategy for deposition of ad hoc committee counsel.							
05-24-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			3.30	860.00	2,838.00
Reviewed portion of deposition testimony of M. Nachawati for purposes of developing factual support for motion to dismiss.							
05-24-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
Reviewed Debtor's letter submission to the Court re motion to dismiss discovery issues.							
05-24-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
Analyzed Debtor's letter submission re common interest communications.							
05-24-2023	RSM	B110 - Case Administration			0.70	860.00	602.00
Drafted budget and staffing plan for first interim period per UST guidelines and request.							
05-24-2023	RSM	B160 - Fee/Employment Application			0.20	860.00	172.00
Revised draft D2 declaration.							
05-24-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	860.00	258.00
Reviewed analysis of objective futility caselaw.							
05-24-2023	UI	B110 - Case Administration			0.90	485.00	436.50
Preparing reading materials for incoming partner (B. Vallacher) and associate (M. Layden) who will be staffed on this matter.							
05-24-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.90	485.00	436.50
Analyzing the scope of Section 548 in Chapter 11 bankruptcy proceeding for the motion to dismiss trial.							
05-24-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.70	485.00	339.50
Meeting with J. Massey to discuss legal strategy for MTD hearing.							
05-24-2023	UI	B160 - Fee/Employment Application			0.50	485.00	242.50
Follow-up discussion with K. Petitti regarding modifications to billing.							
05-24-2023	SD	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.30	500.00	1,150.00
Analyze federal law regarding the distribution of courts which do not consider the possibility of successful reorganization as a consideration regarding whether a chapter 11 filing was made in bad faith.							
05-24-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	485.00	48.50
Analyzing J. Massey's memorandum regarding scope of section 1112(b)(2).							
05-25-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	485.00	145.50
Reviewing M. Nachawati Deposition outline circulated by Michelle A. Parfitt.							
05-25-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.50	485.00	727.50
Analyzing the applicability of the "no harm, no foul" doctrine of Section 548 in a Chapter 11 bankruptcy proceeding for the motion to dismiss trial.							
05-25-2023	SD	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.40	500.00	1,200.00
Analyze whether bankruptcy courts in the Second and Third Circuits exclude evidence on the grounds of relevance for purposes of developing argument for motion to dismiss.							
05-25-2023	JSM	B160 - Fee/Employment Application			0.30	1,160.00	348.00
Reviewing further revised retention submission.							
05-25-2023	JSM	B160 - Fee/Employment Application			0.30	1,160.00	348.00
Reviewing revised staffing plan and budget.							
05-25-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.80	485.00	388.00

Date	Professional	Task	Exhibit A	Page 36 of 43	Hours	Rate	Amount
Analyzing the actual harm requirement of Section 548 in a Chapter 11 bankruptcy proceeding for the motion to dismiss trial.							
05-25-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.50	485.00	242.50
Preparing email communication to J. Massey with Section 548 research for motion to dismiss trial.							
05-25-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.50	485.00	242.50
Meeting with co-counsel from various firms to discuss legal strategy on the motion to dismiss trial.							
05-25-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.70	485.00	824.50
Meeting with committee and co-counsel from various firms to discuss legal strategy on the motion to dismiss trial.							
05-25-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.30	485.00	630.50
Analyzing J. Massey's memorandum regarding scope of section 1112(b)(2).							
05-25-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	860.00	258.00
Correspondence with co-counsel re strategic sequencing of testimony and evidence at motion to dismiss trial.							
05-25-2023	RSM	B110 - Case Administration			0.50	860.00	430.00
Participated in weekly Zoom conference with co-counsel re case developments and priorities.							
05-25-2023	RSM	B160 - Fee/Employment Application			0.10	860.00	86.00
Correspondence with colleague re draft budget and staffing plan.							
05-25-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.80	860.00	688.00
Participated in Zoom conference with committee members, committee representatives, and co-counsel re case status and strategy, including for motion to dismiss discovery issues.							
05-25-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
Analyzed claimant argument re bankruptcy process.							
05-25-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			5.20	1,160.00	6,032.00
Drafting insert to MTD reply.							
05-25-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	1,160.00	232.00
Email communication with TCC counsel re MTD briefing schedule.							
05-25-2023	RA	B110 - Case Administration			0.20	320.00	64.00
Revise M&G budget for and staffing plan for April 14, 2023 - July 31, 2023.							
05-25-2023	RA	B110 - Case Administration			0.40	320.00	128.00
Prepare counsel for talc claimants budget and staffing plans.							
05-25-2023	UI	B110 - Case Administration			0.20	485.00	97.00
Preparing reading materials for incoming partner (B. Vallacher) and associate (M. Layden) who will be staffed on this matter.							
05-25-2023	JSM	B110 - Case Administration			0.50	1,160.00	580.00
Zoom with TCC counsel to discuss legal strategy and next steps.							
05-25-2023	JSM	B110 - Case Administration			1.60	1,160.00	1,856.00
Zoom with TCC members and representatives to discuss legal strategy and next steps.							
05-26-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			5.60	1,160.00	6,496.00
Drafting insert to MTD reply.							
05-27-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.80	1,160.00	3,248.00
Reviewing debtor's omnibus opposition to motions to dismiss.							
05-27-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	1,160.00	232.00
Teleconference with David Castleman of Otterbourg re MTD reply.							
05-27-2023	JSM	B190 - Other Contested Matters (excluding			1.00	1,160.00	1,160.00

Date	Professional	Task	Exhibit A	Page 37 of 43	Hours	Rate	Amount
			assumption / rejection motions)				
05-27-2023	JSM		Zoom with TCC counsel re MTD reply.				
			B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
05-27-2023	JSM		Email communication with TCC counsel MTD reply.				
			B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	1,160.00	232.00
			Additional email communication with TCC counsel MTD reply.				
05-27-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	1,160.00	580.00
			Zoom with Mike Winograd and MTD legal team regarding MTD reply.				
05-27-2023	RSM		B110 - Case Administration		0.90	860.00	774.00
			Zoom with co-counsel re strategies and work to prepare for upcoming Court hearing.				
05-27-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.10	860.00	86.00
			Correspondence with co-counsel re financial distress arguments.				
05-28-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	860.00	344.00
			Reviewed D. Stoltz analysis of LTL strategic actions preceding bankruptcy.				
05-28-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	860.00	172.00
			Reviewed J. Massey analysis of purpose of original funding agreement.				
05-28-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	860.00	344.00
			Analyzed LTL testimony re decision to file first bankruptcy.				
05-28-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	860.00	172.00
			Correspondence with committee representatives and co-counsel re LTL testimony re decision to file first bankruptcy.				
05-28-2023	RSM		B110 - Case Administration		0.30	860.00	258.00
			Reviewed TCC's objection to J&J motion for protective order.				
05-28-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		5.30	1,160.00	6,148.00
			Drafting outline of reply brief in support of motions to dismiss.				
05-28-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
			Email communication with TCC counsel regarding motion to dismiss briefing.				
05-28-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
			Reviewing draft objection to motion for protective order.				
05-28-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
			Reviewing letter to court regarding Jones Day conflict on 2021 Funding Agreement.				
05-28-2023	JSM		B110 - Case Administration		0.30	1,160.00	348.00
			Email communication with TCC counsel re plan for Tuesday hearing.				
05-29-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		4.70	1,160.00	5,452.00
			Drafting outline of motion to dismiss reply brief.				
05-29-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00
			Reviewing revised letter to court regarding Jones Day conflict on 2021 Funding Agreement.				
05-29-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.60	1,160.00	696.00
			Reviewing findings of fact/conclusions of law in Aearo case for possible use in MTD reply brief.				
05-29-2023	JSM		B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,160.00	348.00

Date	Professional	Task	Exhibit A	Page 38 of 43	Hours	Rate	Amount
			Email communication with TCC counsel regarding motion to dismiss briefing.				
05-29-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00		172.00
			Correspondence with co-counsel re effect of voidability on divisive merger.				
05-29-2023	RSM		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	860.00		172.00
			Reviewed TCC letter submission to the Court re motion to compel communications re termination of funding agreement.				
05-29-2023	UI		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	485.00		339.50
			Analyzing research prepared by S. Davis on applicability of motion in limine to bench trial for motion to dismiss trial.				
05-29-2023	UI		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.90	485.00		436.50
			Review of May 29, 2023 TCC letter to compel filed with the Court circulated by Gregory S. Kinoian.				
05-29-2023	UI		B110 - Case Administration	0.20	485.00		97.00
			Drafting communication to J. Massey regarding onboarding of B. Vallacher and M. Layden to LTL.				
05-29-2023	UI		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00		97.00
			Review draft letter to the Court re Debtor's response to LTL's opposition to the motion for derivative standing pursuing claims arising from the termination of the 2021 Funding Agreement circulated by Daniel M. Stolz.				
05-30-2023	UI		B190 - Other Contested Matters (excluding assumption / rejection motions)	3.90	485.00		1,891.50
			Analyzing Debtor's Omnibus Objection to Motions to Dismiss Chapter 11 case for the motion to dismiss trial.				
05-30-2023	SD		B190 - Other Contested Matters (excluding assumption / rejection motions)	4.30	500.00		2,150.00
			Analyze arguments raised by debtor in objection to motion to dismiss.				
05-30-2023	UI		L450 - Trial and Hearing Attendance	1.70	485.00		824.50
			Attend bankruptcy court hearing re the discovery of the consumer business, the production of the unredacted claimant list, the NDAs, and other matters.				
05-30-2023	UI		B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	485.00		582.00
			Discussion with J. Massey and B. Vallacher on legal strategy for motion to dismiss trial.				
05-30-2023	UI		B160 - Fee/Employment Application	0.30	485.00		145.50
			Reviewing LTL2 Budget and Staffing Plans circulated by Rachel Morse.				
05-30-2023	UI		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00		48.50
			Discussion with B. Vallacher on bankruptcy hearing re discovery issues.				
05-30-2023	UI		B140 - Relief from Stay / Adequate Protection Proceedings	0.20	485.00		97.00
			Reviewing notes from J. Massey regarding the appointment of the future claims representative.				
05-30-2023	UI		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	485.00		97.00
			Reviewing J. Massey's email re the "directness" of the claims against J&J.				
05-30-2023	UI		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	485.00		194.00
			Meeting with B. Vallacher to discuss legal strategy for MTD hearing.				
05-30-2023	BV		B190 - Other Contested Matters (excluding assumption / rejection motions)	2.50	775.00		1,937.50
			Reviewing motion to dismiss and Debtor's opposition to the motion to dismiss in order to draft legal analysis for our reply in support of our motion to dismiss.				
05-30-2023	UI		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00		48.50
			Reviewing memorandum drafted by M. Reining on prospective preliminary injunction appeal.				
05-30-2023	UI		B110 - Case Administration	0.60	485.00		291.00
			Drafting communication to B. Vallacher and M. Layden regarding integration to LTL litigation team.				
05-30-2023	UI		B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	485.00		48.50

Date	Professional	Task	Exhibit A	Page 39 of 43	Hours	Rate	Amount
			assumption / rejection motions)				
05-30-2023	JSM		Attendance at Deposition of James Murdica conducted by M. Winograd.		0.40	1,160.00	464.00
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
05-30-2023	BV		Email communication with TCC counsel regarding motion to dismiss briefing.		1.70	775.00	1,317.50
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
05-30-2023	BV		Attended hearing before the Honorable Michael B. Kaplan in the matter of discovery of the consumer business, production of the unredacted claimant list, the NDAs, and other matters.		1.30	775.00	1,007.50
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
05-30-2023	RSM		Conference with J. Massey and U.Ibrahim discussing next steps in drafting reply ISO motion to dismiss.		0.20	860.00	172.00
		B160 - Fee/Employment Application					
05-30-2023	RSM		Correspondence with colleagues re revisions to retention application.		0.30	860.00	258.00
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
05-30-2023	RSM		Confer with colleague and co-counsel re motion to dismiss trial preparation.		0.40	860.00	344.00
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
05-30-2023	RSM		Attended portion of remote deposition of Murdica for purposes of developing factual record on motion to dismiss.		2.60	860.00	2,236.00
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
05-30-2023	RSM		Reviewed portion of remote deposition of Wuestoff for purposes of developing factual record on motion to dismiss.		1.40	860.00	1,204.00
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
05-30-2023	RSM		Attended Court hearing re motion to dismiss discovery motions and other disputes.		0.20	860.00	172.00
		B160 - Fee/Employment Application					
05-30-2023	RSM		Correspondence with co-counsel re retention application issues.		0.30	860.00	258.00
		B160 - Fee/Employment Application					
05-30-2023	RSM		Prepared all counsel budgets and staffing plans for review by Committee members and representatives.		0.20	860.00	172.00
		B160 - Fee/Employment Application					
05-30-2023	RSM		Correspondence with Committee members and representatives re all counsel budgets and staffing plans.		0.10	860.00	86.00
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
05-30-2023	RSM		Reviewed J&J's reply in support of motion for protective order.		0.20	860.00	172.00
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
05-30-2023	RSM		Reviewed TCC opposition to Debtor's motion to compel.		0.60	860.00	516.00
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
05-30-2023	RSM		Analyzed Debtor's argument re financial distress for the motion to dismiss.		0.30	860.00	258.00
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
05-30-2023	RSM		Correspondence with colleagues re Debtor's argument re financial distress.		0.50	860.00	430.00
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
05-30-2023	RSM		Reviewed portion of remote deposition of Birchfield for purposes of developing factual record on motion to dismiss.		0.30	860.00	258.00
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
05-30-2023	JSM		Correspondence with co-counsel re outcome of court hearing and next steps.		0.30	1,160.00	348.00
		B190 - Other Contested Matters (excluding assumption / rejection motions)					
		Reviewing CA2 decision in Purdue Pharma for possible use in MTD reply brief.					

Date	Professional	Task	Exhibit A	Page 40 of 43	Hours	Rate	Amount
05-30-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	1,160.00	232.00
		Email communication with TCC counsel re CA2 decision in Purdue Pharma .					
05-30-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
		Reviewing research on evidentiary standard for financial distress for MTD reply brief.					
05-30-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	1,160.00	464.00
		Email communication with David Castleman and Otterbourg team regarding motion to dismiss briefing.					
05-30-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	1,160.00	464.00
		Email communication with Massey & Gail team regarding motion to dismiss briefing.					
05-30-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
		Preparing for hearing in bankruptcy court.					
05-30-2023	JSM	B110 - Case Administration			1.30	1,160.00	1,508.00
		Attend hearing in bankruptcy court.					
05-30-2023	JSM	B110 - Case Administration			1.20	1,160.00	1,392.00
		Drafting statement of issues for FCR appeal.					
05-30-2023	JSM	B110 - Case Administration			0.70	1,160.00	812.00
		Reviewing designation of record for FCR appeal.					
05-30-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			4.80	1,160.00	5,568.00
		Drafting reply brief in support of motion to dismiss.					
05-31-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			6.20	1,160.00	7,192.00
		Drafting reply brief in support of motion to dismiss.					
05-31-2023	JSM	B110 - Case Administration			0.50	1,160.00	580.00
		Zoom with TCC counsel re next steps and legal strategy.					
05-31-2023	JSM	B110 - Case Administration			1.10	1,160.00	1,276.00
		Zoom with TCC members and representatives re next steps and legal strategy.					
05-31-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
		further email communication with David Castleman and Otterbourg team regarding motion to dismiss briefing.					
05-31-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			3.30	1,160.00	3,828.00
		Drafting opposition to forthcoming motion to extend preliminary injunction .					
05-31-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
		Reviewing draft TCC Objection to LTL motion to compel.					
05-31-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	1,160.00	116.00
		Revising draft TCC Objection to LTL motion to compel.					
05-31-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	1,160.00	232.00
		Email communication with Mike Winograd re draft TCC Objection to LTL motion to compel.					
05-31-2023	JSM	B160 - Fee/Employment Application			0.30	1,160.00	348.00
		Reviewing supplemental retention papers as TCC counsel.					
05-31-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,160.00	348.00
		Reviewing research on Johns Manville trust for MTD reply.					
05-31-2023	ML	B190 - Other Contested Matters (excluding assumption / rejection motions)			4.70	500.00	2,350.00
		Drafting memorandum regarding Johns-Manville bankruptcy trust and later restructuring.					
05-31-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.20	485.00	1,067.00
		Analyzing the scope of the frustration doctrine according to New Jersey state law for the motion to dismiss trial.					

Date	Professional	Task	Exhibit A	Page 41 of 43	Hours	Rate	Amount
05-31-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.80	485.00	388.00
		Meeting with co-counsel from various firms to discuss legal strategy on the motion to dismiss trial.					
05-31-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.00	485.00	485.00
		Meeting with committee and co-counsel from various firms to discuss legal strategy on the motion to dismiss trial.					
05-31-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.30	485.00	1,115.50
		Analyzing the scope of the frustration doctrine according to North Carolina state law for the motion to dismiss trial.					
05-31-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	860.00	344.00
		Correspondence with co-counsel re further legal arguments in support of motion to dismiss.					
05-31-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.40	860.00	1,204.00
		Reviewed portion of remote deposition of Lisman for purposes of developing factual support for motion to dismiss.					
05-31-2023	RSM	B160 - Fee/Employment Application			0.20	860.00	172.00
		Confer with Houlihan Lokey re questions re retention application process.					
05-31-2023	RSM	B160 - Fee/Employment Application			0.40	860.00	344.00
		Correspondence with co-counsel re further work on supplemental retention applications.					
05-31-2023	RSM	B160 - Fee/Employment Application			0.30	860.00	258.00
		Correspondence with committee representatives re approval for supplemental retention applications.					
05-31-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.80	860.00	688.00
		Participated in weekly Zoom conference with co-counsel re case progress and priorities, including preparing for motion to dismiss trial.					
05-31-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.00	860.00	860.00
		Participated in weekly Zoom conference with committee representatives and co-counsel re case developments and strategies, including work for motion to dismiss.					
05-31-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	860.00	258.00
		Reviewed Debtor's motion to compel plaintiff firms to supplement interrogatory responses.					
05-31-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.90	775.00	1,472.50
		Reviewing Third Circuit opinion and subsequent Bankruptcy Court decision dismissing LTL 1.0 in order to draft legal analysis for our reply in support of our motion to dismiss.					
05-31-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	775.00	155.00
		Discussion with J. Massey regarding reply in support of motion to dismiss argument I suggested regarding good faith.					
05-31-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)			5.00	775.00	3,875.00
		Conducting legal research regarding reply in support of motion to dismiss argument I suggested regarding good faith.					
05-31-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.70	775.00	542.50
		Conference with co-counsel re case developments and strategies, including preparation for motion to dismiss hearing.					
05-31-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.90	775.00	697.50
		Conference with committee members, co-counsel, and representatives re case developments and strategies, including for the preliminary injunction and motion to dismiss.					
05-31-2023	BV	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	775.00	232.50
		Reviewing and suggesting revisions to draft objections to new motion to compel.					

Date	Professional	Task	Exhibit A	Page 42 of 43	Hours	Rate	Amount
05-31-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	1,160.00	464.00
		Email communication with TCC counsel regarding motion to dismiss briefing.					
05-31-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	1,160.00	464.00
		Email communication with Massey & Gail team regarding motion to dismiss briefing.					
05-31-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	485.00	194.00
		Reviewing In re Congoleum circulated by Daniel M. Stolz.					
05-31-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	485.00	48.50
		Discussion with J. Massey on bankruptcy hearing re discovery issues.					
05-31-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	485.00	48.50
		Drafting communication to B. Vallacher re legal strategy on motion to dismiss trial.					
05-31-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.60	485.00	291.00
		Analyzing Debtor's Omnibus Objection to Motions to Dismiss Chapter 11 case.					
05-31-2023	SD	B190 - Other Contested Matters (excluding assumption / rejection motions)			3.40	500.00	1,700.00
		Analyze arguments raised by debtor in objection to motion to dismiss.					
05-31-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.50	485.00	727.50
		Analyzing the applicability of the frustration doctrine to matters in federal Chapter 11 bankruptcy proceeding for the motion to dismiss trial.					
05-31-2023	UI	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	485.00	48.50
		Drafting communication to B. Vallacher regarding committee meeting.					
					Total		647,013.50

Time Summary

Professional	Hours	Amount
Bret Vallacher	14.50	11,237.50
Jeremy Mallory	2.40	1,920.00
Jonathan Massey	381.60	431,346.00
Matthew Collette	3.60	3,600.00
Matthew Layden	4.70	2,350.00
Rachel Morse	138.30	118,938.00
Rob Aguirre	16.70	5,344.00
Schuylar Davis	13.80	6,900.00
Usama Ibrahim	139.40	65,378.00
	Total	647,013.50

Expenses

Expense	Description	Amount
E110 - Out of town travel	JSM - Amtrak for travel to Trenton to attend NJ bankruptcy PI hearing.	393.00
E110 - Out of town travel	JSM - lodging while in NJ for PI hearing.	223.52
E110 - Out of town travel	JSM - local transportation while in Trenton for PI hearing.	114.78
E112 - Court fees	US Bankruptcy Court, District of New Jersey - pro hac vice fee for Jonathan Standish Massey.	150.00
E110 - Out of town travel	JSM - Amtrak for travel to Trenton to attend 5/9 NJ bankruptcy hearing.	339.00

Expense	Description	Exhibit A	Page 43 of 43	Amount
E110 - Out of town travel	JSM - Airfare for travel to Trenton to attend 5/9 NJ bankruptcy hearing.			268.90
E110 - Out of town travel	JSM - Local travel for Trenton, NJ bankruptcy hearing.			109.22
E110 - Out of town travel	JSM - Meal while in Trenton to attend NJ bankruptcy hearing.			34.50
E110 - Out of town travel	JSM - Lodging while in Trenton to attend NJ bankruptcy hearing.			435.81
E110 - Out of town travel	JSM -Airfare for NYC Brown Rudnick meeting.			228.90
E110 - Out of town travel	JSM -Amtrak for NYC Brown Rudnick meeting.			337.00
E110 - Out of town travel	JSM - Local travel while in NYC for Brown Rudnick meeting.			152.95
E110 - Out of town travel	UI -Amtrak DC to NYC to New York City for in-person strategy session.			206.00
E110 - Out of town travel	UI -Lodging while in NYC for Brown Rudnick meeting.			312.17
E110 - Out of town travel	UI -Meal while in NYC for Brown Rudnick meeting.			16.09
E110 - Out of town travel	JSM - Lodging while in Trenton to attend NJ bankruptcy hearing.			642.37
E110 - Out of town travel	UI -Return trip from NYC for Brown Rudnick meeting.			208.97
Total Expenses				4,173.18
Total for this Invoice				651,186.68